

RCRA RECORD CENTER
Infilling Cover Sheet

NAME Eliana Tamayas

MAIL CODE 07U-45

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DATE 9-8-99

EPA I.D.#	FACILITY NAME	TYPE FILE
2AD 00074072	Avondale Industries	42 / EN / Technical

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

AUG 23 1999

file

Mr. Eugene Aspuru
Director of Corporate Plant
Engineering & Maintenance
Avondale Industries
5100 River Rd.
Avondale, LA 70094

Dear Mr. Aspuru:

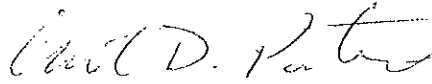
Enclosed is a copy of the inspection report for the Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) performed at Avondale Industries, Avondale, Louisiana facility by the U.S. Environmental Protection Agency (EPA) on June 8 and 9, 1999. Attachments provided by the facility have not been included in this report. A copy of this report will also be sent to the Louisiana Department of Environmental Quality.

The CEI report identifies some areas of concerns about waste management practices at Avondale Industries, as these practices relate to the RCRA regulations. The areas of concern were discussed with you during the exit briefing. The areas of concern are listed in the following paragraphs for your information and records:

1. Satellite Accumulation Points - Requirements:
Containers used to accumulate hazardous waste at or near the point of generation (Satellite Accumulation Point) must be marked with the words "hazardous waste" or with other words that identify the content of the containers.
2. Used Oil - Generator Requirements:
Containers and/or tanks used to store used oil must be labeled "used oil".

If you have any questions concerning the inspection report, please contact
Ms. Iliana Tamacas of my staff at (214) 665-8491.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Carol D. Peters".

Carol D. Peters, Chief
Arkansas, Louisiana, Oklahoma,
& New Mexico Section
Hazardous Waste Enforcement Branch

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75202-2733

Inspection Date: June 8 & 9, 1999 EPA ID Number: LAD000740712

Facility Name: Avondale Industries

Physical Location: 5100 River Rd.
Avondale, LA 70094

Mailing Address: Same as physical address

Type of Ownership: ☐ Federal ☐ State ☐ County ☐ Municipal ☒ Private

Inspection Participants: (name and phone number)

Lead EPA Inspector: Iliana Tamacas (EPA) (214) 665-8491 Initials (3): I.E.T.

Other Participants: Torrence Saulsberry (LDEQ) (504) 471-2800

Facility Representative(s):

Name	Title	
<u>Steve Lacoste</u>	<u>Environmental Manager</u>	<u>(504) 436-5173</u>
<u>Eugene J. Aspuru</u>	<u>Dir. Corporate Plant Engineering & Maintenance</u>	<u>(504) 436-5173</u>
<u>Timothy Fontenot</u>	<u>Hazardous Waste Coordinator</u>	<u>(504) 436-5173</u>

Facility Description: Ship Building facility.

Generator Status:

☒ LQG (>1000kg/mo) ☐ SQG (100kg/mo to 1000kg/mo) ☐ CESQG (<100kg/mo)

Inspection Type: ☒ EPA Lead ☐ State Lead ☐ CSE ☒ CEI
☐ CDI ☐ Sampling ☐ Multi-Media ☐ Other

Reason for Evaluation:

<input type="checkbox"/> (01) Follow up	<input type="checkbox"/> (02) Case Development	<input type="checkbox"/> (03) Sampling
<input type="checkbox"/> (04) Citizen Complaint	<input checked="" type="checkbox"/> (07) General	<input type="checkbox"/> (16) CAV
<input type="checkbox"/> (63) US/Mexico	<input type="checkbox"/> (65) CAV-US/Mexico	

Checklists Completed:

<input checked="" type="checkbox"/> Generator	<input checked="" type="checkbox"/> Generator Supplement	<input type="checkbox"/> Tanks
<input checked="" type="checkbox"/> Containers	<input type="checkbox"/> Surface Impoundments	<input type="checkbox"/> Transporter
<input type="checkbox"/> Subpart AA/BB	<input type="checkbox"/> Subpart CC	<input checked="" type="checkbox"/> Photographs
<input type="checkbox"/> Sampling Data	<input checked="" type="checkbox"/> Other <u>Used Oil</u>	
<input type="checkbox"/> Attachments: <u>facility documentation</u>		

Peer Reviewed by: Deena Wooten

Date: 8/17/99

Background:

The inspection team arrived at the facility at 1:00 PM. The inspectors were met by Mr. Steve Lacoste who is the company's environmental manager. The inspectors showed their credentials to Mr. Lacoste and explained the reason for their visit. Mr. Lacoste explained the plant was in a summer schedule and operations stopped at 2:00 PM. Due to the company's schedule, the inspectors decided to do the records review and go over the company's processes that afternoon and returned the following day for the site tour.

A Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) was conducted at Avondale Industries (Avondale) on June 8 and 9, 1999. Avondale is located at 5100 River Rd., Avondale, Louisiana. Avondale is a ship building company, and it is a large quantity generator (LQG) of hazardous waste. The ship building process includes welding, painting, plating, and blasting operations on-site. The facility covers approximately 260 acres including a paint booth area, a blast house, several fabrication areas, one less than 90-day hazardous waste storage area, a hazardous waste consolidation area, several satellite accumulation points (SAP's), a dock area, a ship cleaning area, and a waste water treatment unit. The ships are built in an assembly line type process. Ship parts are built in different modules and put together at the end. Once the ships are completed, they are launched from Avondale's docks.

Avondale receives steel by rail cars and stores it in the structural storage area. The steel is cut into sheets. The steel sheets go through an assembly line process in the fabrication shops. The fabrication shops are fifty by fifty feet warehouses used to build different parts of the ship. Once the ship units are finished, they are moved to building ways where they are put together. The ships are transferred to a dry dock where they are re-painted and finished.

Most of the waste generated by the facility consists of waste paint and Methyl Ethyl Ketone (MEK) from ship painting operations. Other waste generated by the facility in smaller amounts includes acid waste and cutting fluid. Avondale has SAP's by the docks. The SAP's are used to accumulate 5-gallon cans with waste paint and/or MEK used during the day. After each daily shift, the 5-gallon paint cans are transferred to the waste consolidation area (3-day hazardous waste storage area). In the hazardous waste consolidation area, waste paint and MEK are transferred from the 5-gallon cans into 55-gallon drums. The empty or dry paint cans are crushed, profiled, and disposed as non-hazardous waste. The hazardous waste drums are transferred to the less than 90-days storage area within three days.

Site Tour and Records Review:

Mr. Lacoste explained Avondale is a ship building company. The company builds large vessels using an assembly line process. Avondale receives the raw materials, builds units of the ship, puts all the units together, and launches ships from Avondale's docks. Mr. Lacoste explained the company's processes using a site map (see attachment C-1). After Mr. Lacoste's briefing, the inspectors reviewed hazardous waste manifest, hazardous and non-hazardous waste profiles, used oil manifests, site maps, and hazardous waste analytical information. The inspectors exited the facility at 2:30 PM.

On Wednesday June 9 the inspection team arrived at the facility at 8:00 AM and started the tour of the facility. Since the facility was spread throughout a large area (260 acres), the tour was done by car. The first area visited was the less than 90-day hazardous waste storage area. The area was gated and it had a roofed concrete area where the hazardous waste was stored. This area had approximately thirty 55-gallon steel drums and five 55-gallon poly-propylene drums containing hazardous waste (see photographs # 1 & # 2). All the drums were closed, were in good condition, and were labeled "hazardous waste" and with the accumulation dates (see photograph # 3). There was one over packed drum labeled corrosive (see photograph # 4) which contained sulfuric acid, and the company had not decided if they would use or dispose of the acid. Outside the roofed area, there were about twenty 55-gallon drums containing non-hazardous waste (see photograph # 5). Most of the non-hazardous waste contained used oil, and they were labeled non-hazardous waste - used oil (see photograph # 6).

The inspection team inspected the hazardous waste consolidation area where the waste paint is consolidated from 5-gallon containers into 55-gallon drums. The area had two full 55-gallon drums with waste paint (see photograph # 7). The drums were properly labeled, closed, and in good condition. This area also had a can crusher used to crush the empty paint cans and three 5-yard roll-off bins used to accumulate the empty cans (see photograph # 8). All the 5-gallon cans came from the SAP's located by the dock areas where the ships are re-painted once they are built. The SAP's consist of 10-yard steel cages labeled no smoking (see photograph # 9). 5-gallon paint cans containing some waste paint are accumulated in these steel cages (SAP's). The inspector explained to Mr. Lacoste that the cages had to be labeled hazardous waste and/or waste paint (the cages content). Furthermore, the inspector noted that there was a potential to exceed 55-gallons in the SAP and if this was the case, the cage would have to be dated for the amount in excess of 55-gallons. Mr. Lacoste explained the cans were transferred to the waste consolidation area daily.

At the time of the inspection, the only hazardous waste observed was the waste paint and MEK. The inspection team walked through the maintenance shop where only used oil was being accumulated in a container labeled used oil. The inspectors visited a fabrication shop where only scrap metal waste is generated and the blast house where steel shots are used to remove paint from the steel sheets. No hazardous waste was observed in these areas.

After the tour of the process areas, the inspection team visited the gas treating plant where the company cleans their barges from the building processes for inspections. The company uses a hot water wash and the waste water is treated in the company's waste water treatment unit located at this site. The waste water treatment unit is a biological treatment plant with a carbon filtering unit. The waste water is treated and the effluent is tested and discharged into the river if it is within the permitted discharge limits. The bio-sludge from the waste water treatment unit is profiled and disposed as non-hazardous waste (see attachment C-2).

This area also has a used oil storage area where used oil collected from Avondale's processes is accumulated in a 5000-gallon barge. The used oil collected is transferred into a 4000-gallon tank, de-watered, pumped into the barge, and sold to other company's. The used oil is regularly sampled and sent to be analyzed by Avondale (see attachment C-4).

After the tour of the facility the inspection team gave an exit briefing to Mr. Aspuru, the plant manager. The inspectors went over the areas of concern, and exited the facility at 12:30 PM.

Areas of Concern:

1. Satellite Accumulation Points used to store 5-gallon waste paint cans were not labeled "hazardous waste" nor with their content.
2. The barge used to store the de-watered used oil was not labeled with the words "used oil".

INDEX TO ATTACHMENTS

A. RCRA CEI Checklists

Generators checklist
Generators Supplement checklist
Land Disposal Restriction checklist
Container Storage checklist
Used Oil Checklist

B. Photographic Log

C. Documentation provided by the facility:

1. Site map
2. Non-hazardous waste profiles
3. MSDS for Blastout 2000
4. Analytical information and results
5. Sludge disposal records
6. Annual hazardous waste activity report
7. Hazardous waste manifest with LDR
8. Satellite accumulation points inspection form
9. Water Discharge Permit

ATTACHMENT

A

FACILITY NAME: Avondale Industries Inc.
EPA ID NUMBER: LAD000740712

RCRA COMPLIANCE INSPECTION REPORT
GENERATORS CHECKLIST

NOTE: On multiple part questions, circle those not in compliance.

EPA Identification NO. (262.12)

1. Does the Generator have an EPA I.D. No.? Yes No
A. If yes, what is that number?

LAD000740712

Hazardous Waste Determination (262.11)

1. Does the generator generate hazardous waste(s) listed in Subpart D? (261.30 - 261.33 - List of Hazardous Waste) Yes No

a. If yes, list wastes and quantities on attachment (Include EPA Hazardous Waste Number, waste name and description).

2. Does the generator generate solid waste(s) that exhibit hazardous characteristics? (circle those applicable - corrosivity, ignitability, reactivity, TC toxicity) (261.20 - 261.24 - Characteristics of Hazardous Waste) Both Yes No

a. If yes, list wastes and quantities on attachment (Include EPA Hazardous Waste Number, Waste Name and Description.)

DOO1, DOO5, DOO7, DOO8, DOO35, FOO3, FOO5

b. Does the generator determine characteristics by testing or by applying knowledge of processes? Both

- i. If determined by testing, did the generator use test methods in Part 261, Subpart C (or Equivalent)? Yes No

ii. If equivalent test were methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes deemed non-hazardous generated by the generator? (i.e. process waste streams, collected matter from air pollution control equipment, water treatment sludge, etc.) Yes No

a. If yes, did the generator determine non-hazardous characteristics by testing or knowledge of process? Both

FACILITY NAME: _____

EPA ID NUMBER: _____

- i. If determined by testing, did the generator use test methods in Part 261, Subpart C (or Equivalent)? ☒ Yes ☐ No
- ii. If equivalent test methods were used, attach copy of equivalent methods used.
- b. List wastes and quantities deemed non-hazardous or processes from which non-hazardous wastes were produced. (Use narrative explanations sheet) *spent blast abrasive treated wood (AS).*
4. Are any wastes recycled, reused or reclaimed on-site? ☒ Yes ☐ No
*Paper recycling
Tene catridge
H/S bulbs
(compreser)
oil*
- If yes, use narrative sheet to describe the type and quantity of the waste and the method used for reclamation.
5. Are any wastes shipped off-site for reclamation? ☒ Yes ☐ No
- If yes, use narrative to describe the type and quantity of the waste and its destination. Also give a description of storage prior to shipment.
6. Is the total quantity of hazardous wastes generated?
- a. Less than 100 kg/month? ☐ Yes ☒ No
- b. More than 1000 kg/month? ☒ Yes ☐ No
- c. More than 100 but less than 1000 kg/month? ☐ Yes ☒ No

Manifest

1. Does the generator ship hazardous waste off-site? ☒ Yes ☐ No
- a. If no, do not fill out Section C and D.
- b. If yes, identify primary off-site facility(s). (Use narrative explanations sheet)
2. Has the generator shipped hazardous waste off-site since November 19, 1980? ☒ Yes ☐ No
3. Is the generator exempted from regulation because of:
- Small quantity generator (261.5 - Special requirements) ☐ Yes ☒ No

OR

GENERATORS

2

REVISION--MAY 1992

FACILITY NAME: Avondale

EPA ID NUMBER: _____

Produces only non-hazardous solid waste at this time (261.4 - Exclusions)

___ Yes ___ ☒ No

4. If the generator is exempted as a small quantity generator are the following requirements met?

NA

- a. The waste is reclaimed under a contractual agreement in which:

i. The type of waste and frequency of shipments specified in the agreement?

___ Yes ___ No

ii. The vehicles used to transport the waste to the recycling facility and to deliver regenerated material back to the generator is owned and operated by the reclaimer of the waste?

___ Yes ___ No

- b. The generator maintains a copy of the reclamation agreement in his files for a period of at least three years after termination or expiration of the agreement?

___ Yes ___ No

Required Information (262.21)

5. If not exempted does the generator use manifest?

☒ Yes ___ No

- a. If yes, does manifest include the following information (262.21 - Required information)

☒ Yes ___ No

(Circle those not on manifest)

i. Manifest Document No. ☒

ii. Generator's Name, Mailing Address, Tele. No. ☒

iii. Generator EPA I.D. No. ☒

iv. Transporter(s) Name and EPA I.D. No. ☒

v. Facility Name, Address and EPA I.D. No. ☒

vi. DOT description of the waste ☒

vii. a. Quantity (weight or volume) ☒
b. Containers (type and number)

viii. Emergency Information (optional) ☒
(Special handling instructions, Phone No.)

FACILITY NAME: _____

EPA ID NUMBER: _____

ix. Waste minimization certification

x. Is the following certification on each manifest form?

☒ Yes ☐ No

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

Uses of the Manifest (263.23)

6. Does the generator retain copies of manifests?

☒ Yes ☐ No

(Check completed manifests at random. Indicate how many manifests were inspected, how many violations were noted and the type of violation.)

If yes, complete a through e. If questions contain more than one item, circle those not in compliance.

a. i. Did the generator sign and date all manifests inspected?

☒ Yes ☐ No

ii. Who signed for the generator?

Name: Lisa Chambers Regene Asprue
Title: env. coordinator 1st
I.D. Number: LA000740712

b. i. Did the generator obtain handwritten signature and date of acceptance from initial transporter?

☒ Yes ☐ No

ii. Who signed for the transporter?

Name: Tommy Cox
Title: _____
I.D. Number: AUD 981020894

c. Does the generator retain one copy of manifest signed by generator and transporter?

☒ Yes ☐ No

d. Do returned copies of manifest include facility owner/operator signature and date of acceptance?

☒ Yes ☐ No

e. If copy of manifest from facility was not returned within 45 days, did the generator file an exception report?
(262.42 - Exception reporting)

☒ Yes ☐ No

FACILITY NAME: Avondale
EPA ID NUMBER: LA0000740712

- i. If yes, did it contain the following information:

Legible copy of manifest

Yes No *NA*

AND

Cover letter explaining
generators efforts to locate
waste.

Yes No *NA*

- f. Does (will) the generator retain copies for 3 years?

Yes No

Pre-Transport Requirements

1. Does the generator package waste?

Yes No *NA*

If no, skip to question 9.

If yes, complete the following questions.

Inspect containers ready for immediate shipment.

If there are no such containers, skip to question 8.

2. Does the generator package waste in accordance with 49 CFR 173, 178, and 179? (DOT requirements) (262.30 - Packaging)

Yes No

3. Are containers to be shipped leaking, corroding or bulging?

Yes No

Use narrative explanations sheet to describe containers and condition.

4. Does the generator use DOT labeling requirements in accordance with 49 CFR 172 when containers are offered for shipment? (262.31 - Labeling)

Yes No

5. Does the generator mark each package in accordance with 49 CFR 172 when containers are offered for shipment? (262.32 - Marking)

Yes No

6. a. Is each container of 110 gallons or less marked with the following label when containers are offered for shipment?

Yes No

HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address _____

Manifest Document Number _____

- b. If other labels exist, list in narrative.

FACILITY NAME: Alondale
EPA ID NUMBER: _____

7. If there are any vehicles present on site loading or unloading hazardous waste, inspect for presence of placards. Note this instance on narrative explanation sheet.

posed 8. Satellite Accumulation (effective June 20, 1985)

- a. Does the generator accumulate waste in containers at or near "Satellite" generation points?

☒ Yes ☐ No

If no, skip to question 9.
If yes, complete the following.

- b. Are containers in good condition?

☒ Yes ☐ No

- c. Is the waste compatible with the containers?

☒ Yes ☐ No

- d. Is waste transferred from leaking containers or otherwise managed to control leakage?

☒ Yes ☐ No

- e. Are containers closed?

☒ Yes ☐ No

- f. Are containers marked with the words "hazardous waste" or identification of the contents?

☐ Yes ☒ No *attention*

- g. Has waste accumulation exceeded one (1) quart of acutely hazardous waste (261.33 e.) or 55 gallons of other hazardous waste?

☐ Yes ☒ No *marked them with an inspection tag*

If yes,

- i. Has the container holding the excess amount been marked with the date the excess began accumulating?

☐ Yes ☒ No *pp*

- ii. Have excess amounts remained in the satellite accumulation area longer than three (3) days?

☐ Yes ☒ No

9. Accumulation Time (262.34 - Accumulation Time for Small Quantity Generators)

- a. Is waste generated > 100 kg/month, but < 1000 kg/month?

☐ Yes ☐ No

If yes, answer rest of question #9.
If no, skip to question #10.

- b. Is hazardous waste shipped offsite within 180 days?

☐ Yes ☐ No

- c. Has the quantity of waste accumulated on-site exceeded 6000 kilograms?

☐ Yes ☐ No

FACILITY NAME: Avondale

EPA ID NUMBER: LA D000 740 712

- d. Does the generator comply with the requirements of Part 265 Subpart C, Preparedness and Prevention?

1 Yes No NA

10. Accumulation Time (262.34 - Accumulation Time)

- a. Is the site a permitted/interim status storage facility?

Yes No

If yes, skip to Section E, and complete and attach the TSD checklist and appropriate supplemental checklists. If no, answer rest of question #8.

- b. Is hazardous waste shipped offsite within 90 days?

Yes No

- c. Is waste stored in containers or tanks?

Yes No

- d. Is the beginning date of accumulation time clearly indicated on each container?

Yes No

- e. Is each container or tank marked with the words "Hazardous Waste"?

Yes No

- f. Complete and attach the containers/tanks supplemental checklists as appropriate.

- g. If the generator accumulates waste on-site for less than 90 days, complete RCRA Generators Checklist Supplement.

Recordkeeping and Report

1. Is the generator keeping the following reports for a minimum of three (3) years? (262.40 - Recordkeeping):

- a. Manifests and signed copies from designated facilities?

Yes No

- b. Biennial reports (or reports as required by state agencies)

Yes No

- c. Exception Reports

NA Yes No

- d. Test results, where applicable.

Yes No

2. Where are records kept (at facility or elsewhere)?

Facility

FACILITY NAME: Avondale

EPA ID NUMBER: _____

3. Who is in charge of keeping the records?

Name: Timothy Fontenot

Title: environmental / waste management coordinator

Special Condition

1. Has the generator received from or transported to a foreign source any hazardous waste?
(262.50 - International Shipments)

If yes,

a. Has a note been filed with the R.A.?

b. Is this waste manifested and signed by Foreign Consignee?

c. If the generator transported wastes out of the country has he received confirmation of delivered shipment?

d. Has the generator filed an annual report (by March 1 of each year) giving the type, quantity, frequency and destination of all exported hazardous waste? (Per HSWA 1984)

NA
____ Yes ____ No
____ Yes ____ No
____ Yes ____ No
____ Yes ____ No
____ Yes ____ No

FACILITY NAME: Avondale
EPA ID NUMBER: LA 0000 746712

RCRA GENERATORS CHECKLIST
SUPPLEMENT

Personnel Training (265.16)

1. Have facility personnel successfully completed a program of classroom or on-the-job training? ☒ Yes ☐ No
- a. Does the training program include instructions in the following:
- (1) procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? ☒ Yes ☐ No
- (2) key parameters for automatic waste feed cut-off systems? ☒ Yes ☐ No
- (3) operation of communication or alarm systems? ☒ Yes ☐ No
- (4) response to fires, explosions and groundwater contamination incidents? ☒ Yes ☐ No
- (5) shutdown of operations? ☒ Yes ☐ No
- (6) general hazardous waste management procedures? ☒ Yes ☐ No
- b. Is the program directed by a person trained in hazardous waste management procedures? ☒ Yes ☐ No
- c. Have personnel completed annual training reviews? ☒ Yes ☐ No
- d. Does the owner/operator maintain the following documents:
- (1) Job title, job description and name of employee for each position at the facility related to hazardous waste management? ☒ Yes ☐ No
- (2) Written description of the type and amount of both introductory and continuing training? ☒ Yes ☐ No
- (3) Written documentation that the training has been completed by facility personnel? ☒ Yes ☐ No

FACILITY NAME: _____

EPA ID NUMBER: _____

Preparedness and Prevention (265.30)

1. Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and operation of facility)

☒ Yes ☐ No

If yes, use narrative explanations sheet to explain.

2. Is the facility equipped with (265.32 - Required equipment)

a. Internal communications or alarm system

☒ Yes ☐ No

b. Telephone or two-way radio to call emergency response personnel

☒ Yes ☐ No

c. Portable fire extinguishers, fire control equipment spill control equipment and decontamination equipment

☒ Yes ☐ No

1. Is this equipment tested to assure its proper operation?

☒ Yes ☐ No

d. Water of adequate volume for hoses, sprinklers or water spray system

☐ Yes ☐ No

1. Describe source of water

at the

*have been
fire department*

2. Indicate flow rate and/or pressure and storage capacity, if available.

3. Is there sufficient aisle space to allow unobstructed movement of personnel and emergency equipment? (265.35-Required Aisle Space)

☒ Yes ☐ No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements with local authorities)

☒ Yes ☐ No

If no, has the owner/operator attempted to make such arrangements?

☒ Yes ☐ No

FACILITY NAME: Avondale

EPA ID NUMBER: _____

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with local authorities)

☒ Yes ☐ No

If yes, indicate primary authority:

company fire department local

- a. Is the fire department a city or volunteer fire department?

city/Henryton/Avondale fire dept

6. Does the owner/operator have phone numbers or and agreements with State emergency response teams, emergency response contractors and equipment suppliers?

☒ Yes ☐ No

Are they readily available to the emergency coordinator? (265.37 - Arrangements with local authorities)

☒ Yes ☐ No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility?

☒ Yes ☐ No

If no, has the owner/operator attempted to do this? (265.37 - Arrangements with local authorities)

☒ Yes ☐ No

Contingency Plan and Emergency Procedures (265.50) (

1. Does the facility have a contingency plan? (265.52 Content of Contingency Plan)

☒ Yes ☐ No

a. If yes, does it contain:

1. actions to be taken in response to emergencies?

☒ Yes ☐ No

2. description of arrangements with police, fire and hospital officials?

☒ Yes ☐ No

3. list of names, addresses, phone numbers of persons qualified to act as emergency coordinator?

☒ Yes ☐ No

4. list, including the location and physical description of all emergency equipment?

☒ Yes ☐ No

FACILITY NAME: _____

EPA ID NUMBER: _____

5. evacuation plan for facility personnel including signals, primary and alternate routes? ☒ Yes ☐ No
2. Is a copy of the contingency plan maintained at the facility? (265.53 - Copies of contingency plan) ☒ Yes ☐ No
3. Has a copy been supplied to the local police, fire depts., and hospitals? (265.53 - Copies of contingency plan) ☒ Yes ☐ No
4. Has the contingency plan been updated and amended as necessary? ☒ Yes ☐ No
5. Is the plan a revised SPCC Plan? (265.52 - Content of contingency plan) ☒ Yes ☐ No
6. Is there an emergency coordinator on-site or within short driving distance of the plant at all times? ☒ Yes ☐ No

If yes, list primary emergency coordinator:

Ben Rock
emergency coordinator

FACILITY NAME: Avondale
EPA ID NUMBER: LAD0000740712

CONTAINERS STORAGE CHECKLIST
(SUBPART I - USE AND MANAGEMENT OF CONTAINERS 265.170)

1. Does the facility store hazardous waste in containers?

☒ Yes ☐ No

If no, do not complete this form.

Condition of Containers (265.171)

2. Are the containers in good condition?
(check for leaks, corrosion, bulges, etc.)

☒ Yes ☐ No

If no, explain in narrative and document with photograph.

3. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container?

☒ Yes ☐ No

Compatibility of Waste with Containers (265.172)

4. Is the waste compatible with the containers and/or its liner?

☒ Yes ☐ No

If no, explain in narrative.

Management of Containers (265.173)

5. Are the stored containers closed?

☒ Yes ☐ No

If no, explain in narrative.

6. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak?

☐ Yes ☒ No

If yes, explain in narrative.

Inspections (265.174)

7. Are each of the containers inspected at least weekly?

☒ Yes ☐ No

If no, explain in the narrative the frequency of inspection.

FACILITY NAME: Avondale
EPA ID NUMBER: _____

Special Requirements for Ignitable or Reactive Waste (265.176)

8. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line?

☒ Yes ☐ No

If no, explain in narrative and document with photograph.

Special Requirements for Incompatible Wastes (265.177)

9. Are incompatible wastes stored in the same containers?

☐ Yes ☐ No

If yes, explain in narrative.

10. Are hazardous waste stored in an unwashed container that previously held an incompatible waste?

☐ Yes ☐ No

11. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance?

☐ Yes ☐ No

If no, explain in narrative.

FACILITY NAME: Avondale
EPA ID NUMBER: LA000074012

LAND DISPOSAL RESTRICTIONS CHECKLIST

Form A - Restricted Waste Determination

Note: This form must be completed during all RCRA Compliance Evaluation Inspections (CEIs). Additional forms (B through G) may be required depending on the types of wastes generated or handled.

Section I. Restricted Wastes

<input checked="" type="checkbox"/> D001	<input type="checkbox"/> D002	<input type="checkbox"/> D003	<input type="checkbox"/> D004	<input type="checkbox"/> D005
<input type="checkbox"/> D006	<input checked="" type="checkbox"/> D007	<input checked="" type="checkbox"/> D008	<input type="checkbox"/> D009	<input type="checkbox"/> D010
<input type="checkbox"/> D011	<input type="checkbox"/> D012	<input type="checkbox"/> D013	<input type="checkbox"/> D014	<input type="checkbox"/> D015
<input type="checkbox"/> D016	<input type="checkbox"/> D017			
<input type="checkbox"/> F001	<input type="checkbox"/> F002	<input checked="" type="checkbox"/> F003*	<input type="checkbox"/> F004	<input checked="" type="checkbox"/> F005
<input type="checkbox"/> F006	<input type="checkbox"/> F007	<input type="checkbox"/> F008	<input type="checkbox"/> F009	<input type="checkbox"/> F010
<input type="checkbox"/> F011	<input type="checkbox"/> F012	<input type="checkbox"/> F019	<input type="checkbox"/> F020	<input type="checkbox"/> F021
<input type="checkbox"/> F022	<input type="checkbox"/> F023	<input type="checkbox"/> F024	<input type="checkbox"/> F025	<input type="checkbox"/> F026
<input type="checkbox"/> F027	<input type="checkbox"/> F028	<input type="checkbox"/> F037	<input type="checkbox"/> F038	<input type="checkbox"/> F039
<input type="checkbox"/> K001	<input type="checkbox"/> K002	<input type="checkbox"/> K003	<input type="checkbox"/> K005	<input type="checkbox"/> K006
<input type="checkbox"/> K007	<input type="checkbox"/> K008	<input type="checkbox"/> K009	<input type="checkbox"/> K010	<input type="checkbox"/> K011
<input type="checkbox"/> K013	<input type="checkbox"/> K014	<input type="checkbox"/> K015	<input type="checkbox"/> K016	<input type="checkbox"/> K017
<input type="checkbox"/> K018	<input type="checkbox"/> K019	<input type="checkbox"/> K020	<input type="checkbox"/> K021	<input type="checkbox"/> K022
<input type="checkbox"/> K023	<input type="checkbox"/> K024	<input type="checkbox"/> K025	<input type="checkbox"/> K026	<input type="checkbox"/> K027
<input type="checkbox"/> K028	<input type="checkbox"/> K029	<input type="checkbox"/> K030	<input type="checkbox"/> K031	<input type="checkbox"/> K032
<input type="checkbox"/> K033	<input type="checkbox"/> K034	<input type="checkbox"/> K035	<input type="checkbox"/> K036	<input type="checkbox"/> K037
<input type="checkbox"/> K038	<input type="checkbox"/> K039	<input type="checkbox"/> K040	<input type="checkbox"/> K041	<input type="checkbox"/> K042
<input type="checkbox"/> K043	<input type="checkbox"/> K044	<input type="checkbox"/> K045	<input type="checkbox"/> K046	<input type="checkbox"/> K047
<input type="checkbox"/> K048	<input type="checkbox"/> K049	<input type="checkbox"/> K050	<input type="checkbox"/> K051	<input type="checkbox"/> K052
<input type="checkbox"/> K060	<input type="checkbox"/> K061	<input type="checkbox"/> K062	<input type="checkbox"/> K069	<input type="checkbox"/> K071
<input type="checkbox"/> K073	<input type="checkbox"/> K083	<input type="checkbox"/> K084	<input type="checkbox"/> K085	<input type="checkbox"/> K086
<input type="checkbox"/> K087	<input type="checkbox"/> K093	<input type="checkbox"/> K094	<input type="checkbox"/> K095	<input type="checkbox"/> K096
<input type="checkbox"/> K097	<input type="checkbox"/> K098	<input type="checkbox"/> K099	<input type="checkbox"/> K100	<input type="checkbox"/> K101
<input type="checkbox"/> K102	<input type="checkbox"/> K103	<input type="checkbox"/> K104	<input type="checkbox"/> K105	<input type="checkbox"/> K106
<input type="checkbox"/> K107	<input type="checkbox"/> K108	<input type="checkbox"/> K109	<input type="checkbox"/> K110	<input type="checkbox"/> K111
<input type="checkbox"/> K112	<input type="checkbox"/> K113	<input type="checkbox"/> K114	<input type="checkbox"/> K115	<input type="checkbox"/> K116
<input type="checkbox"/> K117	<input checked="" type="checkbox"/> K118	<input type="checkbox"/> K123	<input type="checkbox"/> K124	<input type="checkbox"/> K125
<input type="checkbox"/> K126				
<input type="checkbox"/> P001	<input type="checkbox"/> P002	<input type="checkbox"/> P003	<input type="checkbox"/> P004	<input type="checkbox"/> P005
<input type="checkbox"/> P006	<input type="checkbox"/> P007	<input type="checkbox"/> P008	<input type="checkbox"/> P009	<input type="checkbox"/> P010
<input type="checkbox"/> P011	<input type="checkbox"/> P012	<input type="checkbox"/> P013	<input type="checkbox"/> P014	<input type="checkbox"/> P015
<input type="checkbox"/> P016	<input type="checkbox"/> P017	<input type="checkbox"/> P018	<input type="checkbox"/> P020	<input type="checkbox"/> P021
<input type="checkbox"/> P022	<input type="checkbox"/> P023	<input type="checkbox"/> P024	<input type="checkbox"/> P026	<input type="checkbox"/> P027
<input type="checkbox"/> P028	<input type="checkbox"/> P029	<input type="checkbox"/> P030	<input type="checkbox"/> P031	<input type="checkbox"/> P033
<input type="checkbox"/> P034	<input type="checkbox"/> P036	<input type="checkbox"/> P037	<input type="checkbox"/> P038	<input type="checkbox"/> P039
<input type="checkbox"/> P040	<input type="checkbox"/> P041	<input type="checkbox"/> P042	<input type="checkbox"/> P043	<input type="checkbox"/> P044

FACILITY NAME: _____
 EPA ID NUMBER: _____

___ P045	___ P046	___ P047	___ P048	___ P049
___ P050	___ P051	___ P054	___ P056	___ P057
___ P058	___ P059	___ P060	___ P062	___ P063
___ P064	___ P065	___ P066	___ P067	___ P068
___ P069	___ P070	___ P030	___ P071	___ P072
___ P073	___ P074	___ P075	___ P076	___ P077
___ P078	___ P081	___ P082	___ P084	___ P085
___ P087	___ P088	___ P089	___ P092	___ P093
___ P094	___ P095	___ P096	___ P097	___ P098
___ P099	___ P101	___ P102	___ P103	___ P104
___ P105	___ P106	___ P107	___ P108	___ P109
___ P110	___ P111	___ P112	___ P113	___ P114
___ P115	___ P116	___ P118	___ P119	___ P120
___ P121	___ P122	___ P123		

___ U001	___ U002	___ U003	___ U004	___ U005
___ U006	___ U007	___ U008	___ U009	___ U010
___ U011	___ U012	___ U014	___ U015	___ U016
___ U017	___ U018	___ U019	___ U020	___ U021
___ U022	___ U023	___ U024	___ U025	___ U026
___ U027	___ U028	___ U029	___ U030	___ U031
___ U032	___ U033	___ U034	___ U035	___ U036
___ U037	___ U038	___ U039	___ U041	___ U042
___ U043	___ U044	___ U045	___ U046	___ U047
___ U048	___ U049	___ U050	___ U051	___ U052
___ U053	___ U055	___ U056	___ U057	___ U058
___ U059	___ U060	___ U061	___ U062	___ U063
___ U064	___ U066	___ U067	___ U068	___ U069
___ U070	___ U071	___ U072	___ U073	___ U074
___ U075	___ U076	___ U077	___ U078	___ U079
___ U080	___ U081	___ U082	___ U083	___ U084
___ U085	___ U086	___ U087	___ U088	___ U089
___ U090	___ U091	___ U092	___ U093	___ U094
___ U095	___ U096	___ U097	___ U098	___ U099
___ U101	___ U102	___ U103	___ U105	___ U106
___ U107	___ U108	___ U109	___ U110	___ U111
___ U112	___ U113	___ U114	___ U115	___ U116
___ U117	___ U118	___ U119	___ U120	___ U121
___ U122	___ U123	___ U124	___ U125	___ U126
___ U127	___ U128	___ U129	___ U130	___ U131
___ U132	___ U133	___ U134	___ U135	___ U136
___ U137	___ U138	___ U140	___ U141	___ U142
___ U143	___ U144	___ U145	___ U146	___ U147
___ U148	___ U149	___ U150	___ U151	___ U152
___ U153	___ U154	___ U155	___ U156	___ U157
___ U158	___ U159	___ U160	___ U161	___ U162
___ U163	___ U164	___ U165	___ U166	___ U167
___ U168	___ U169	___ U170	___ U171	___ U172
___ U173	___ U174	___ U176	___ U177	___ U178

FACILITY NAME: Abndale
EPA ID NUMBER: _____

___ U179	___ U180	___ U181	___ U182	___ U183
___ U184	___ U185	___ U186	___ U187	___ U188
___ U189	___ U190	___ U191	___ U192	___ U193
___ U194	___ U196	___ U197	___ U200	___ U201
___ U201	___ U202	___ U203	___ U204	___ U205
___ U206	___ U207	___ U208	___ U209	___ U210
___ U211	___ U213	___ U214	___ U215	___ U216
___ U217	___ U218	___ U219	___ U220	___ U221
___ U222	___ U223	___ U225	___ U226	___ U227
___ U228	___ U234	___ U235	___ U236	___ U237
___ U238	___ U239	___ U240	___ U243	___ U244
___ U246	___ U247	___ U248	___ U249	___ U328
___ U353	___ U359			

___ None of the wastes listed above are handled by the generator.
Complete Section II of this form.

☒ One or more of the wastes listed above are handled by the generator
all appropriate forms.

* Applicable only if waste is ignitable.

Section II. California List

Check each box that applies:

- ___ Liquid hazardous wastes or liquids associated with solids or sludges containing free cyanides at concentrations greater than 1000 mg/L.
- ___ Liquid hazardous wastes or liquids associated with solids or sludges containing one or more of the following concentrations:
- ___ Arsenic or compounds containing arsenic greater than 500 mg/L;
 - ___ Cadmium or compounds containing cadmium greater than 100 mg/L;
 - ___ Chromium or compounds containing chromium greater than 500 mg/L;
 - ___ Lead or compounds containing lead greater than 500 mg/L;
 - ___ Mercury or compounds containing mercury greater than 20 mg/L;
 - ___ Nickel or compound containing nickel greater than 134 mg/L;
 - ___ Selenium or compounds containing selenium greater than 100 mg/L;
 - ___ Thallium or compounds containing thallium greater than 130 mg/L.
- ___ Liquid hazardous wastes exhibiting a pH less than or equal to 2.0.
- ___ Liquid hazardous wastes that also contain polychlorinated biphenyls (PCBs) at concentrations between 50 to 500 mg/L.
- ___ Liquid or non-liquid hazardous waste containing halogenated organic compounds at concentrations greater than or equal to 1000 mg/kg.
- ☒ None of the wastes listed above are handled by the generator.
Complete Section III of this form.

FACILITY NAME: _____
EPA ID NUMBER: _____

____ One or more of the wastes listed above are handled by the generator.
Complete all appropriate forms

Note: The treatment standards for some of the California Listed Wastes may have been superseded with treatment standards for the Third Thirds Characteristic Wastes.

Section III. BDAT Treatability Group - Treatment Standards Identification.

I. Does the generator mix restricted wastes which have different treatment standards? YES __ NO __ N/A __

If yes,

A. Did the generator select the most stringent treatment standard? YES __ NO __ N/A __

FACILITY NAME: Avondale
EPA ID NUMBER: _____

Section IV. Characteristic Wastes.

Note: This Section applies to those wastes that are listed under 4901 and also exhibit a characteristic of a hazardous waste under 4903.

1. Does the facility generate hazardous wastes listed under 4901 that also exhibit the characteristic of a hazardous waste under 4903.

YES ☒ NO ☐ N/A ☐

2. List these wastes:

P001, P005, P007, P008

3. Has the generator determined if the treatment standards for listed wastes includes a treatment standard for the constituent that caused the waste to exhibit the characteristic.

YES ☒ NO ☐ N/A ☐

4. Were the most stringent treatment standards selected?

YES ☒ NO ☐ N/A ☐

5. Were characteristic wastes that have been treated and no longer meet the characteristic disposed of in a subtitle D (solid waste disposal) facility?

YES ☒ NO ☐ N/A ☐

If yes,

- A. Did the generator or treatment facility send the Regional administrator a certification to that effect?

YES ☒ NO ☐ N/A ☐

6. Did the certification include the following information:

- A. The name and address of the Subtitle D facility receiving the waste?

YES ☒ NO ☐ N/A ☐

- B. A description of the waste as originally generated, including the applicable EPA hazardous waste number and the treatability group?

YES ☒ NO ☐ N/A ☐

- C. The treatment standards applicable to the waste at the initial point of generation?

YES ☒ NO ☐ N/A ☐

- D. The signature of a duly authorized representative and the appropriate language found in 2247.C.1?

YES ☒ NO ☐ N/A ☐

7. Does the generator treat prohibited wastes in less than 90 day accumulation tanks or containers?

YES ☒ NO ☐ N/A ☐

(If yes, complete Form G)

FACILITY NAME: _____
EPA ID NUMBER: _____

LAND DISPOSAL RESTRICTION CHECKLIST

Form B - Treatment, Storage, and Disposal

Note: This form should be completed only if the generator or handler stores restricted wastes on-site for greater than 90 days or operates RCRA-regulated treatment or disposal units. Small quantity generators who accumulate restricted wastes for less than 180 (270) days are exempt from the following requirements.

Section I. General facility standards

1. Has the facility's waste analysis plan been revised in accordance with 1519.B.7 to reflect requirements under 2245 or 2247?
YES ___ NO ___ N/A ___
2. Has the facility obtained representative chemical and physical analysis of wastes and residues in accordance to 1519 or 4313?
YES ___ NO ___ N/A ___
If yes,
 - A. Chemical and physical analyses of F-solvents and Dioxins
 - i. Has testing included analyses for all F-solvent constituents?
YES ___ NO ___ N/A ___
 - ii. Were all f-solvent constituents analyzed by employing the Toxicity Characteristic Leaching Procedure (TCLP)?
YES ___ NO ___ N/A ___
 - B. Chemical and physical analyses of California List Wastes
 - i. Were the following analyses conducted on California List Wastes:
 - a. pH?
YES ___ NO ___ N/A ___
 - b. Concentrations of PCBs?
YES ___ NO ___ N/A ___
 - c. Concentrations of Halogenated Organic Compounds?
YES ___ NO ___ N/A ___
 - d. Heavy Metal concentration?
YES ___ NO ___ N/A ___
 - e. Cyanide concentration?
YES ___ NO ___ N/A ___

FACILITY NAME: Avondale
EPA ID NUMBER: _____

LAND DISPOSAL RESTRICTIONS CHECKLIST

Form C - Manifesting Restricted Wastes

Note: This form should be completed only if the generator or handler ships restricted waste off-site for treatment or disposal. The following requirements may also apply to treatment facilities (including incinerators) which ship residues, still bottoms, or ash off-site for additional treatment or disposal.

1. If restricted wastes which exceed treatment standards, and are not subject to case-by-case extensions, "no migration" exemption, or nationwide variance, did the generator or handler provide the following information along with each hazardous waste manifest during shipment:

A. Manifest document number?

YES ☒ NO ☐ N/A ☐

B. EPA waste identification code?

YES ☒ NO ☐ N/A ☐

C. Treatment standards for each restricted waste?

YES ☒ NO ☐ N/A ☐

- i. If the treatment standard was listed by reference, did the notification include the following:

a. Subcategory of the waste?

YES ☒ NO ☐ N/A ☐

b. The treatability group?

YES ☒ NO ☐ N/A ☐

c. 40 CFR sections and paragraphs where applicable standards appear?

YES ☒ NO ☐ N/A ☐

Note: Treatment standards for F001-F005, F039 and California List "Halogenated Organic Compounds" cannot be listed by reference.

D. Waste analysis data (if available)?

YES ☒ NO ☐ N/A ☐

E. All applicable restrictions?

YES ☒ NO ☐ N/A ☐

FACILITY NAME: _____
EPA ID NUMBER: _____

2. Identify all off-site treatment facilities accepting wastes exceeding treatment standards?

_____ *Highon Industrial Svs. Inc.* _____

- A. What treatment processes were used?

_____ *NA* _____

_____ *NA* _____

3. If restricted wastes do not exceed treatment standards, are subject to case-by-case extension, have a "no migration" exemption, or a nationwide variance, did the generator or handler provide the following information along with each hazardous waste manifest during shipment:

- A. Manifest document number?

YES ___ NO ___ N/A ___ /

- B. EPA waste identification code?

YES ___ NO ___ N/A ___ /

- C. Treatment standards for each restricted waste?

YES ___ NO ___ N/A ___ /

- i. If the treatment standard was listed by reference, did the notification include the following:

- a. Subcategory of the waste?

YES ___ NO ___ N/A ___ /

- b. The treatability group?

YES ___ NO ___ N/A ___ /

- c. 40 CFR sections and paragraphs where applicable standards appear?

YES ___ NO ___ N/A ___ /

Note: Treatment standards for F001-F005, F039 and California List "Halogenated Organic Compounds" cannot be listed by reference.

- D. Waste analysis data (if available)?

YES ___ NO ___ N/A ___ /

- E. All applicable restrictions?

YES ___ NO ___ N/A ___ /

- F. Date the wastes are subject to restriction?

YES ___ NO ___ N/A ___ /

FACILITY NAME: _____
EPA ID NUMBER: _____

G. The following certification?

YES ☒ NO ☐ N/A ☐

I certify under penalty of law that I personally have been examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility to imprisonment.

Note: The above certification statement must be signed by an authorized representative of the facility.

4. Identify all off-site treatment or disposal facilities accepting wastes below treatment standards:

A. What treatment processes were used?

5. If waste is subject to a nationwide variance, extension or petition has the facility provided notice to disposers that waste is exempt from land disposal restrictions?

YES ☐ NO ☐ N/A ☐

6. Does the generator or handler keep records of all notifications or certifications for waste sent to off-site facilities after August 7, 1988?

YES ☐ NO ☐ N/A ☐

FACILITY NAME: _____
EPA ID NUMBER: _____

Form D - Testing and Management of F-solvents and Dioxins

Note: This form should be completed only if the facility generates or handles F-solvents or Dioxin wastes regardless of concentrations.

1. Has the facility correctly determined the appropriate treatability group [2225] for F-solvents generated or handled on-site (see Appendix A). YES __ NO __ N/A __
2. Has the facility determined whether F-solvent wastes exceed treatment standards based on the following:
 - A. Knowledge of process? YES __ NO __ N/A __
 - i. If facility employs knowledge of process, note adequacies or inadequacies in their methods below:

 - B. Toxicity Characteristic Leaching Process (TCLP)? YES __ NO __ N/A __
 - i. If yes, provide the following information:
 - a. Last test date: _____
 - b. Frequency of testing: _____
 - c. Indicate any problems with testing procedure below:

 - ii. Attach test results to report. ATTACHMENT __
 - iii. Were wastes tested using TCLP when processes or wastestreams changed? YES __ NO __ N/A __
 - iv. Was testing done prior to dilution or solidification? YES __ NO __ N/A __
 - C. Other (specify):

3. Did F-solvent wastes exceed their applicable treatment standards upon generation [2245.C.2]? YES __ NO __ N/A __

6/9/99
Date

CA6006740712
EPA Id

RCRA Compliance Inspection Report
Used Oil Generator Checklist

FACILITY Arundell PHONE _____
LOCATION _____
MAILING ADDRESS _____

GENERATOR STANDARDS FOR USED OIL STORAGE/USED OIL AGGREGATION PTS.

1. Has generator tested used oil for total halogen content? ☒ Yes ☐ No ☐ NA
2. Does the facility mix any other waste stream with the used oil? ☐ Yes ☒ No ☐ NA
(279.21)

If yes, what is mixed with used oil?(check those that apply) NA

- ☐ Listed waste
☐ Characteristic waste
☐ Non-hazardous waste

3. Has used oil been shown to exceed any specifications listed in Table 1? (279.11) ☐ Yes ☐ No ☐ NA

If yes, has the rebuttable presumption been applied by the generator? (279.10(b)(ii)) ☐ Yes ☐ No ☐ NA

If yes, describe in narrative how rebuttable presumption was successfully applied.

4. Are containers and aboveground tanks used to store used oil in good condition? (no severe rusting, apparent structural defects or deterioration) (279.22) *bags used to store oil* ☒ Yes ☐ No ☐ NA

Leaking? ☐ Yes ☒ No ☐ NA

Clearly marked or labeled "Used Oil"? ☐ Yes ☒ No ☐ NA ?

Are fill pipes used to transfer used oil into underground storage tanks clearly marked "Used Oil"? ☐ Yes ☐ No ☒ NA *Ref*

5. Is there any evidence of a release of used oil to the environment? ☐ Yes ☒ No ☐ NA

If yes, was it handled according to 279.22(d)? ☐ Yes ☐ No ☒ NA

6. Does the generator:
☐ Use self-transportation of small amounts to approved collection center (279.24)
☐ Use self-transportation of small amounts to aggregation point owned by generator
☒ Transport under a contractual agreement as per (279.24(3)(c))

ATTACHMENT

B

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log



Photo Number: 1 Photographer: Iliana Tamacas
Location: Avondale Industries
Subject: Hazardous waste drums in Hazardous Waste Storage Area
City/County: Avondale State: LA
Date: 06/09/99 Time: 10:00 AM Weather: Sunny

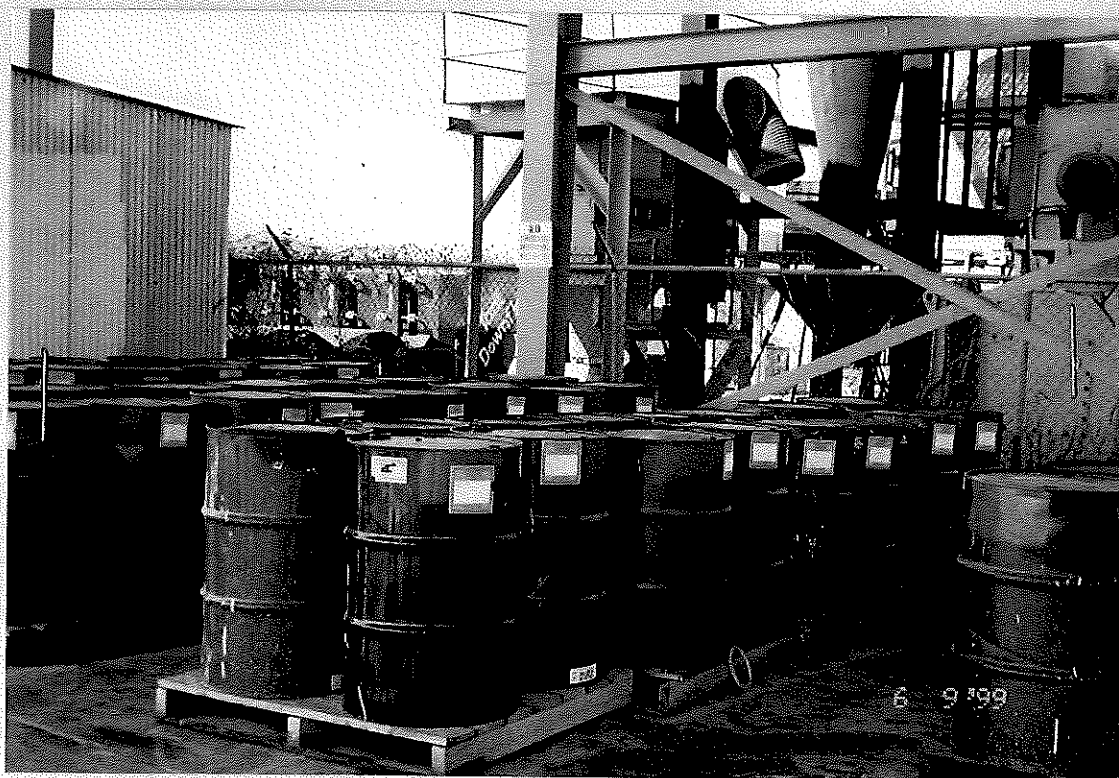


Photo Number: 2 Photographer: Iliana Tamacas
Location: Avondale Industries
Subject: Hazardous waste drums in Hazardous Waste Storage Area
City/County: Avondale State: LA
Date: 06/09/99 Time: 10:00 AM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

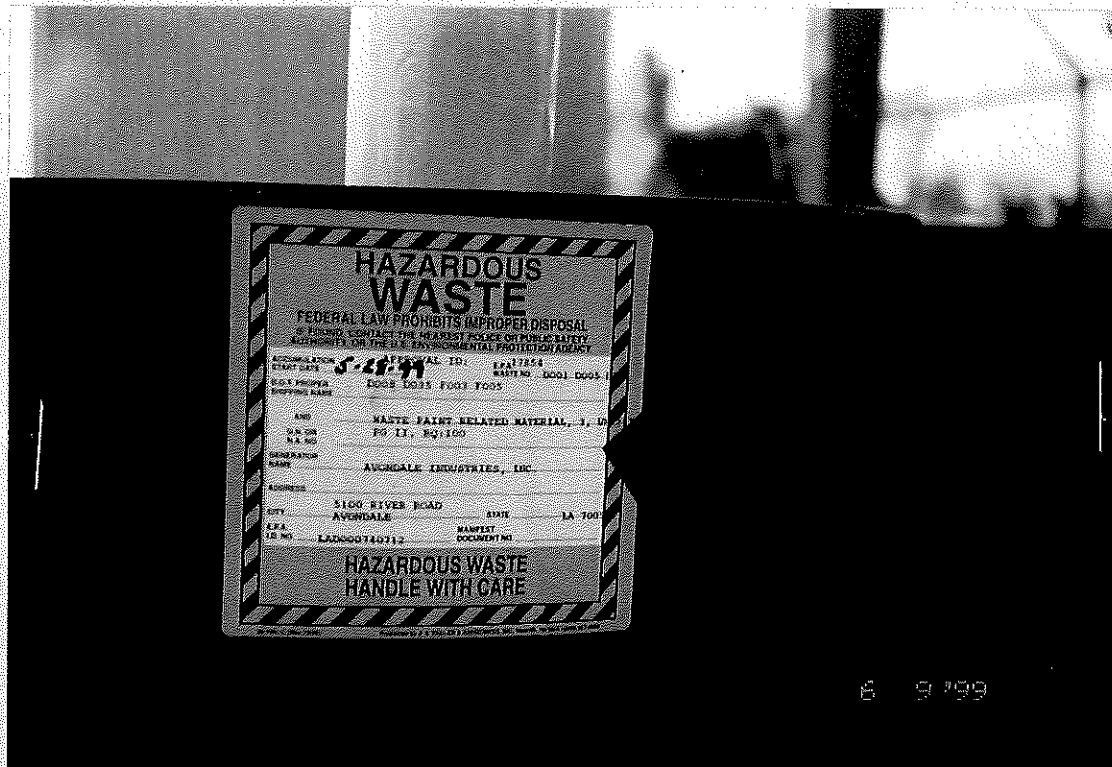


Photo Number: 3 Photographer: Iliana Tamacas
Location: Avondale Industries
Subject: Hazardous waste Label
City/County: Avondale State: LA
Date: 06/09/99 Time: 10:00 AM Weather: Sunny



Photo Number: 4 Photographer: Iliana Tamacas
Location: Avondale Industries
Subject: Overpack With Acid container in Hazardous Waste Area
City/County: Avondale State: LA
Date: 06/09/99 Time: 10:00 AM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

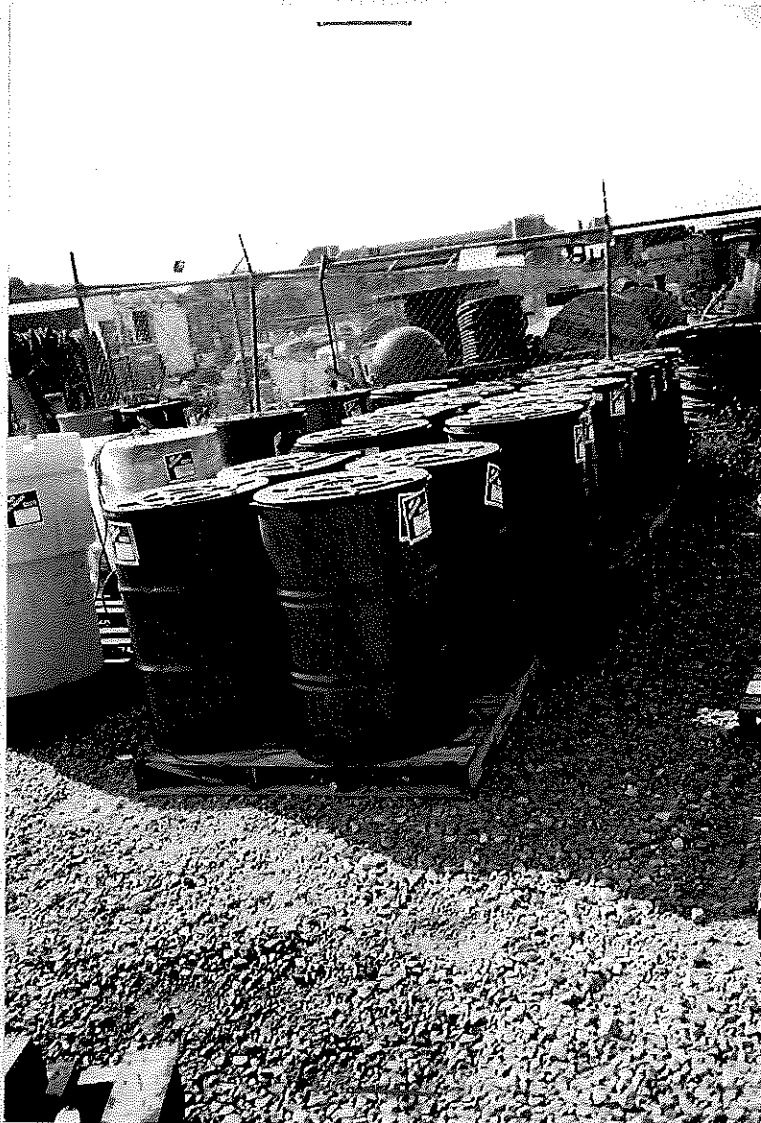


Photo Number: 5 Photographer: Iliana Tamacas

Location: Avondale Industries

Subject: Used Oil Drums in Hazardous Waste Storage Area

City/County: Avondale

State: LA

Date: 06/09/99 Time: 10:00 AM

Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log



Photo Number: 6 Photographer: Iliana Tamacas

Location: Avondale Industries

Subject: Used Oil Label

City/County: Avondale

State: LA

Date: 06/09/99

Time: 10:00 AM

Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

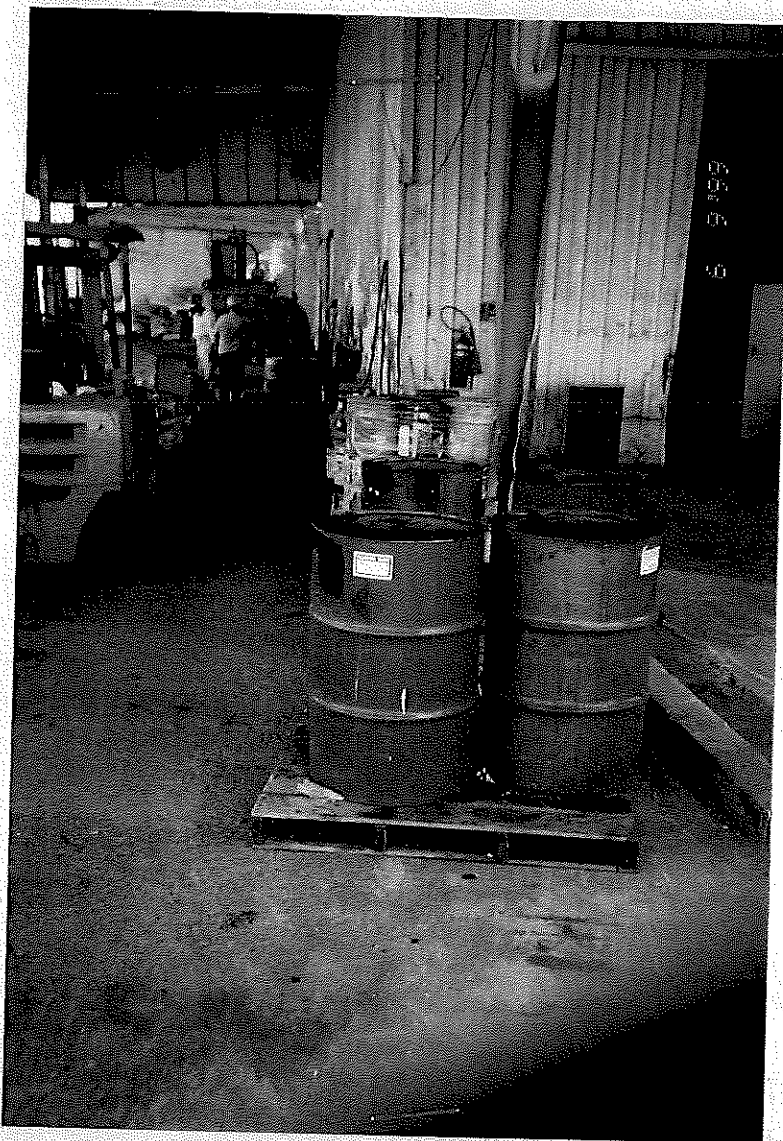


Photo Number: 7 Photographer: Iliana Tamacas
Location: Avondale Industries
Subject: Hazardous Waste Storage Area # 2 (Waste Consolidation Area)
City/County: Avondale State: IA
Date: 06/09/99 Time: 10:00 AM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

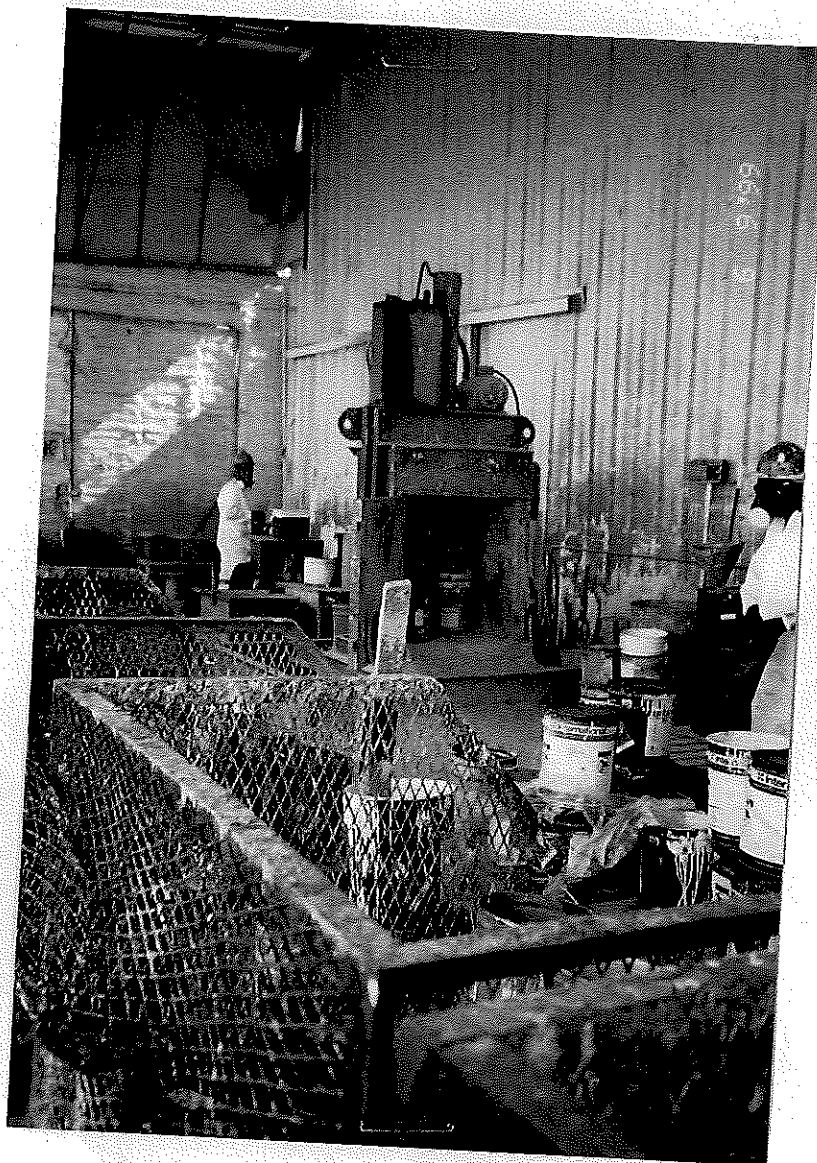


Photo Number: 8 Photographer: Iliana Tamacas
Location: Avondale Industries
Subject: Waste Paint Consolidation Process in Waste Consolidation Area
City/County: Avondale State: LA
Date: 06/09/99 Time: 10:00 AM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log



Photo Number: 9 Photographer: Iliana Tamacas

Location: Avondale Industries

Subject: Satellite Accumulation Area (Unlabeled)

City/County: Avondale

State: LA

Date: 06/09/99

Time: 10:00 AM

Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

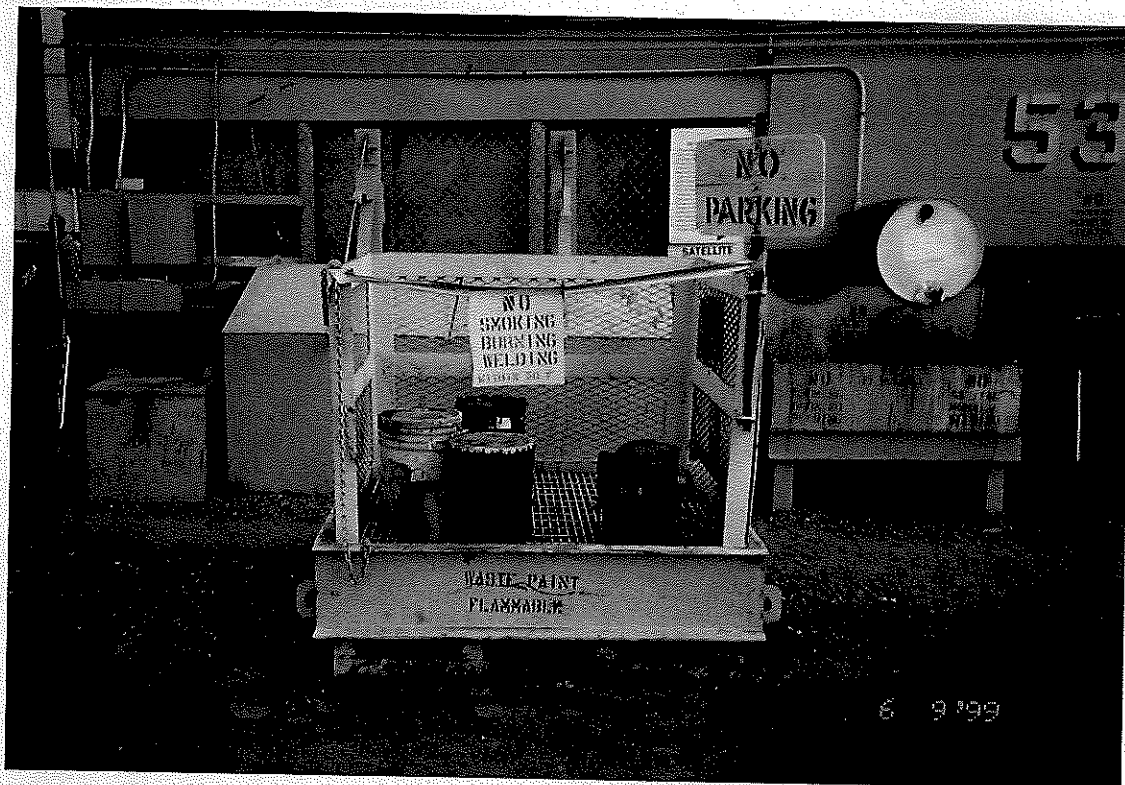


Photo Number: 10 Photographer: Iliana Tamacas
Location: Avondale Industries
Subject: Satellite Accumulation Area (labeled)
City/County: Avondale State: LA
Date: 06/09/99 Time: 10:00 AM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log



Photo Number: 1 Photographer: Iliana Tamacas
Location: Avondale Industries
Subject: Hazardous waste drums in Hazardous Waste Storage Area
City/County: Avondale State: LA
Date: 06/09/99 Time: 10:00 AM Weather: Sunny



Photo Number: 2 Photographer: Iliana Tamacas
Location: Avondale Industries
Subject: Hazardous waste drums in Hazardous Waste Storage Area
City/County: Avondale State: LA
Date: 06/09/99 Time: 10:00 AM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

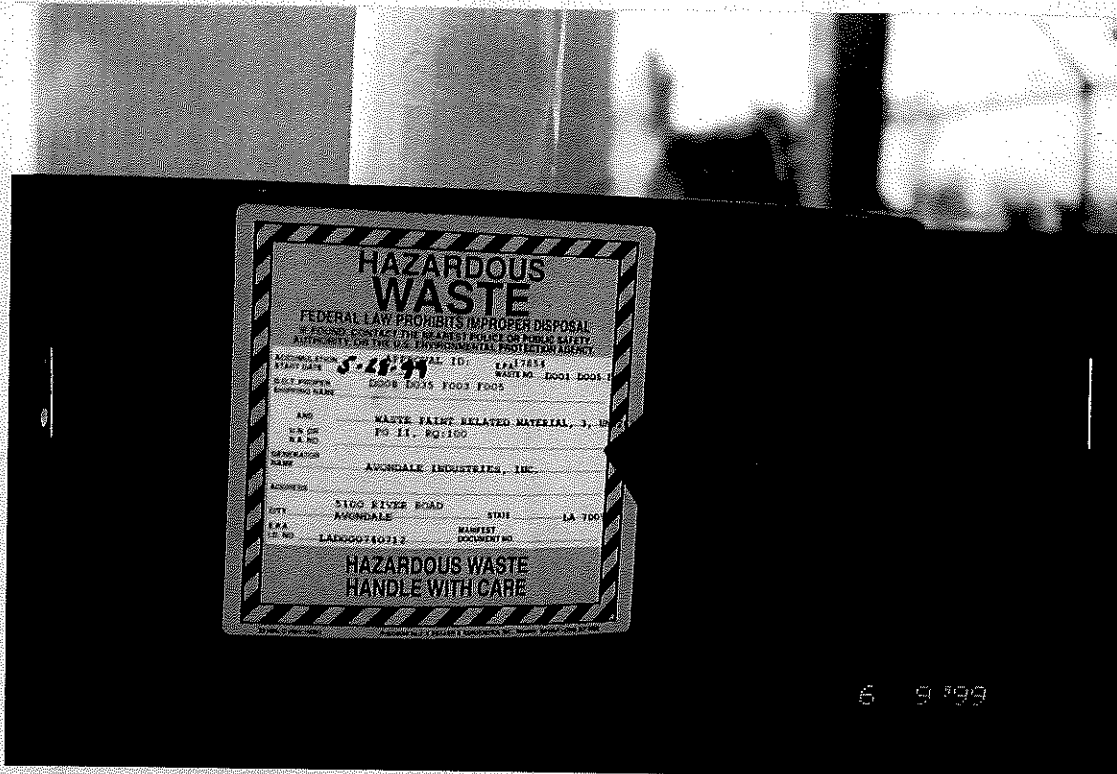


Photo Number: 3 Photographer: Iliana Tamacas
Location: Avondale Industries
Subject: Hazardous waste Label
City/County: Avondale State: LA
Date: 06/09/99 Time: 10:00 AM Weather: Sunny



Photo Number: 4 Photographer: Iliana Tamacas
Location: Avondale Industries
Subject: Overpack With Acid container in Hazardous Waste Area
City/County: Avondale State: LA
Date: 06/09/99 Time: 10:00 AM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log



Photo Number: 5 Photographer: Iliana Tamacas

Location: Avondale Industries

Subject: Used Oil Drums in Hazardous Waste Storage Area

City/County: Avondale

State: LA

Date: 06/09/99

Time: 10:00 AM

Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log



Photo Number: 6 Photographer: Iliana Tamacas

Location: Avondale Industries

Subject: Used Oil Label

City/County: Avondale

State: LA

Date: 06/09/99

Time: 10:00 AM

Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log



Photo Number: 7 Photographer: Iliana Tamacas
Location: Avondale Industries
Subject: Hazardous waste area # 2 (Hazardous Waste consolidation area)
City/County: Avondale State: LA
Date: 06/09/99 Time: 10:00 AM Weather: sunny, warm

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

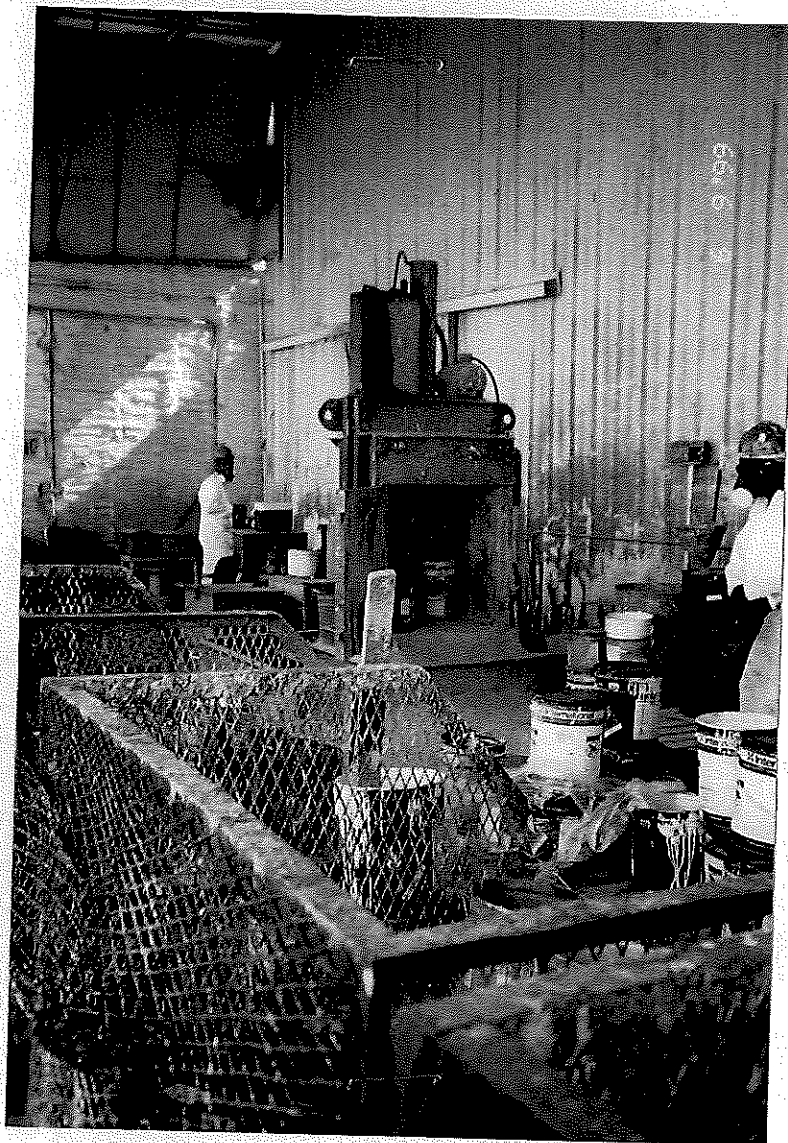


Photo Number: 8 Photographer: Iliana Tamacas
Location: Avondale Industries
Subject: Waste Paint Consolidation Process in Waste Consolidation Area
City/County: Avondale State: LA
Date: 06/09/99 Time: 10:00 AM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log



Photo Number: 9 Photographer: Iliana Tamacas

Location: Avondale Industries

Subject: Satellite Accumulation Area (Unlabeled)

City/County: Avondale

State: LA

Date: 06/09/99

Time: 10:00 AM

Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

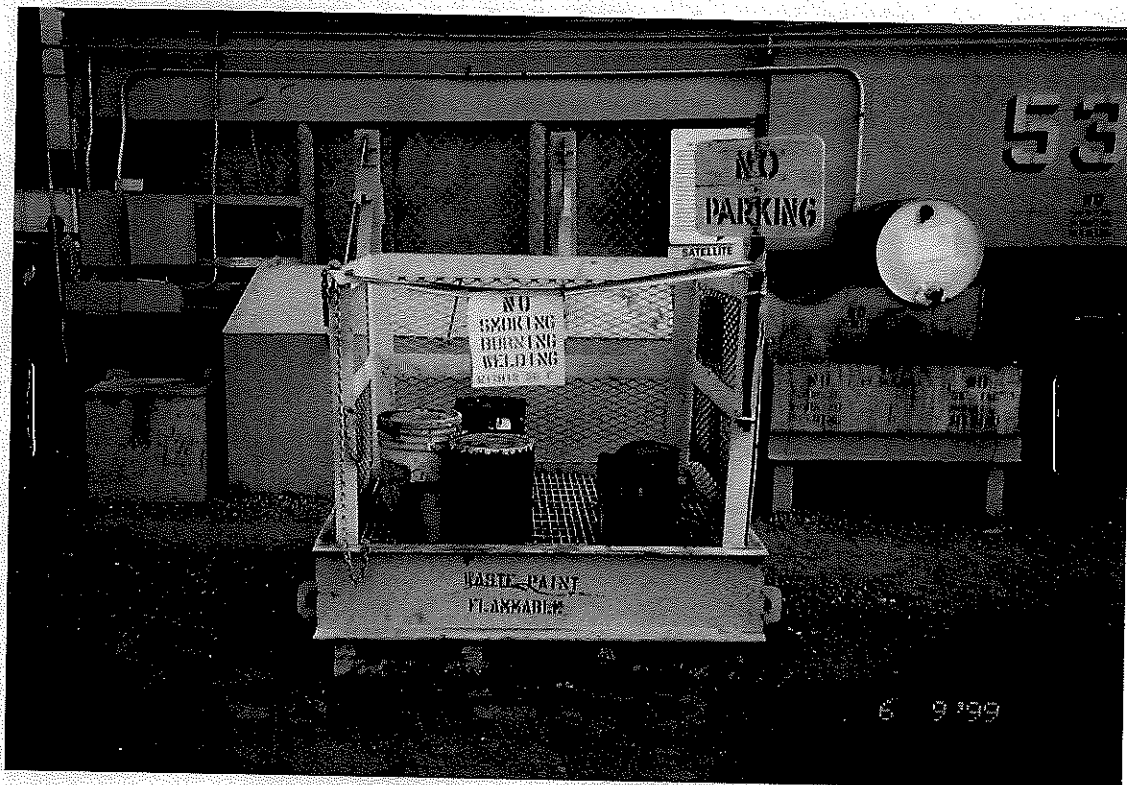


Photo Number: 10 Photographer: Iliana Tamacas

Location: Avondale Industries

Subject: Satellite Accumulation Area (labeled)

City/County: Avondale State: LA

Date: 06/09/99 Time: 10:00 AM Weather: Sunny

C2



GENERATOR'S WASTE PROFILE SHEET PLEASE PRINT IN INK OR TYPE

This form is to be used to comply with the requirements of governmental waste screening criteria.

Profile Number: WMNA 183165

Service Agreement on File? ☒ YES ☐ NO
Renewal Date: 05/31/98 98 99
PLB PLB

A. Waste Generator Information

1. Generator Name: Avondale Industries, Inc. 2. SIC Code: 3731
3. Facility Street Address: 5100 River Road 4. Phone: (504) 436-5204
5. Facility City: Avondale 6. State/Province: LA 7. Zip/Postal Code: 70004
8. Generator USEPA/Federal ID #: ADOC0740712 9. County: Jefferson 10. State/Province ID #: GT 051-5791
11. Customer Name: Avondale Industries, Inc. 12. Customer Phone: (504) 436-5204
13. Customer Contact: Stephanie Tulman 14. Customer Fax: (504) 436-5204

B. Waste Stream Information

1. Name of Waste: Dry Paint & Crush Empty paint cans 2. State Waste Code: _____
3. Process Generating Waste: paint operation

4. Waste Category: ☐ Asbestos Containing Material ☐ Incinerator Ash ☐ Sludge
☐ Chemical Containing Equipment ☒ Industrial Process Waste ☐ Spill Clean Up
☐ De-characterized Waste ☐ Medical Waste ☐ UST Solids
☐ Demolition Debris ☐ Off-Specification Chemicals ☐ Wastes from Service Industries
5. Estimated Annual Volume: 1200 yd³ ☐ Tons ☒ Yards ☐ Other (specify) _____
6. Personal Protective Equipment Requirements: _____
7. Transporter/Transfer Station: _____
8. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (If no, skip 9, 10, and 11) ☐ Yes ☒ No
9. Reportable Quantity (lbs., kgs.): _____ 10. Hazard Class/ID #: _____
11. USDOT Shipping Name: _____

TCIP = 01/11/596 BPK ☒ Check if additional information is attached. Indicate the number of attached pages 7

C. Generator's Certification (Please check appropriate responses, sign, and date below)

1. Is the waste represented by this waste profile sheet a "Hazardous Waste" as defined by USEPA, Canadian, Mexican and/or state/province regulation? ☐ Yes ☒ No
2. Does the waste represented by this waste profile sheet contain regulated radioactive material or regulated concentrations of Polychlorinated Biphenyls (PCBs)? ☐ Yes ☒ No
3. Does this waste profile sheet and all attachments contain true and accurate descriptions of the waste material? ☒ Yes ☐ No
4. Has all relevant information within the possession of the Generator regarding known or suspected hazards pertaining to the waste been disclosed to the Contractor? ☒ Yes ☐ No
5. Is the analytical data attached hereto derived from testing a representative sample in accordance with 40 CFR 261.20 (c) or equivalent rules? ☐ NA ☒ Yes ☐ No
6. Will all changes that occur in the character of the waste be identified by the Generator and disclosed to the Contractor prior to providing the waste to the Contractor? ☒ Yes ☐ No

Certification Signature: Tuyen Nguyen Title: Environmental Coordinator
Name (Type or Print): TUYEN NGUYEN Company Name: Avondale Industries, Inc. Date: 5-24-96

D. WMI Management's Decision

FOR WMI USE ONLY

1. Management Method: ☒ Landfill ☐ Solidify ☐ Bioremediation ☐ Other (Specify) _____
2. Proposed Ultimate Management Facility: Jeff. Parish 3. Hours of acceptance: ☐ NA
4. Prohibitions, Special Handling Procedures, or Limitations on Approval: No free liquids approval for disposal. Updated analysis - 5/97 Updated analysis - 5/98

Generic Approval: ☐ Yes ☒ No
Special Waste Decision: ☒ Approved ☐ Disapproved

Salesperson's Signature: [Signature] Date: 5-30-96
Technical Manager's Signature: [Signature] Date: 5-31-96

GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Profile Number: WMNA **183162**

This form is to be used to comply with the requirements of governmental waste screening criteria.

Service Agreement on File? ☐ YES ☐ NO
Renewal Date: **03/28/96**

A. Waste Generator Information

1. Generator Name: **Avondale Industries, Inc.**
2. SIC Code: **3731**
3. Facility Street Address: **5100 River Road**
4. Phone: **(504) 436-2121 x. 4356**
5. Facility City: **Avondale** 6. State/Province: **LA**
7. Zip/Postal Code: **70072**
8. Generator USEPA/Federal ID #: **LAD000740712** 9. County: **Jefferson**
10. State/Province ID #: _____
11. Customer Name: **Same**
12. Customer Phone: **(504) 436-2121 x. 4356**
13. Customer Contact: **Ben Twiner**
14. Customer Fax: **504 436-5204**

B. Waste Stream Information

1. Name of Waste: **Spent Blast Abrasive** 2. State Waste Code: **5791-067**
3. Process Generating Waste: **Refinishing ships**
4. Waste Category:
☐ Asbestos Containing Material ☐ Incinerator Ash ☐ Sludge
☐ Chemical Containing Equipment ☒ Industrial Process Waste ☐ Spill Clean Up
☐ De-characterized Waste ☐ Medical Waste ☐ UST Soils
☐ Demolition Debris ☐ Off-Specification Chemicals ☐ Wastes from Service Industries
5. Estimated Annual Volume: **200** ☒ Tons ☐ Yards ☐ Other (specify) _____
6. Personal Protective Equipment Requirements: _____
7. Transporter/Transfer Station: **J. P. & Sons**
8. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (If no, skip 9, 10, and 11) ☐ Yes ☒ No
9. Reportable Quantity (lbs.; kgs.): _____ 10. Hazard Class/ID #: _____
11. USDOT Shipping Name: _____

☒ Check if additional information is attached. Indicate the number of attached pages **4**

C. Generator's Certification (Please check appropriate responses, sign, and date below.)

1. Is the waste represented by this waste profile sheet a "Hazardous Waste" as defined by USEPA, Canadian, Mexican and/or state/province regulation? ☐ Yes ☒ No
2. Does the waste represented by this waste profile sheet contain regulated radioactive material or regulated concentrations of Polychlorinated Biphenyls (PCBs)? ☐ Yes ☒ No
3. Does this waste profile sheet and all attachments contain true and accurate descriptions of the waste material? ☒ Yes ☐ No
4. Has all relevant information within the possession of the Generator regarding known or suspected hazards pertaining to the waste been disclosed to the Contractor? ☒ Yes ☐ No
5. Is the analytical data attached hereto derived from testing a representative sample in accordance with 40 CFR 261.20 (c) or equivalent rules? ☐ NA ☒ Yes ☐ No
6. Will all changes that occur in the character of the waste be identified by the Generator and disclosed to the Contractor prior to providing the waste to the Contractor? ☒ Yes ☐ No

Certification Signature *Tuyen Nguyen* Title **Environmental Coordinator**

Name (Type or Print) **Tuyen Nguyen** Company Name **Avondale Industries, Inc.** Date **2-7-96**

D. WMI Management Decision

FOR WMI USE ONLY

1. Management Method: ☐ Landfill ☐ Solidify ☐ Bioremediation ☐ Other (Specify) _____
2. Proposed Ultimate Management Facility: _____ 3. Hours of acceptance: _____ ☐ NA
4. Precautions, Special Handling Procedures, or Limitations on Approval: _____
Generic Approval ☐ Yes ☐ No
Special Waste Decision ☐ Approved ☐ Disapproved
Salesperson's Signature _____ Date _____
Technical Manager's Signature _____ Date _____



GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Profile Number: WMNA 183181
Service Agreement on File? ☒ YES ☐ NO
Renewal Date: 03/04/98

This form is to be used to comply with the requirements of governmental waste screening criteria.

A. Waste Generator Information

- Generator Name: Avondale Industries, Inc.
- SIC Code: 3731
- Facility Street Address: 5100 River Road
- Phone: (504) 436-2121 ext. 4356
- Facility City: Avondale
- State/Province: LA
- Generator USEPA/Federal ID #: LAD000740712
- County: Jefferson
- Customer Name: Avondale Industries, Inc.
- Customer Phone: (504) 436-2121 ext. 4356
- Customer Contact: Tuyen Nguyen
- Customer Fax: (504) 436-5204

B. Waste Stream Information

- Name of Waste: Oil contaminated Soil (Used motor & hydraulic)
- State Waste Code: 5791-001
- Process Generating Waste: Spill clean up
- Waste Category:

<input type="checkbox"/> Asbestos Containing Material	<input type="checkbox"/> Incinerator Ash	<input type="checkbox"/> Sludge
<input type="checkbox"/> Chemical Containing Equipment	<input checked="" type="checkbox"/> Industrial Process Waste	<input type="checkbox"/> Spill Clean Up
<input type="checkbox"/> De-characterized Waste	<input type="checkbox"/> Medical Waste	<input type="checkbox"/> UST Soils
<input type="checkbox"/> Demolition Debris	<input type="checkbox"/> Off-Specification Chemicals	<input type="checkbox"/> Wastes from Service Industries
- Estimated Annual Volume: 42-50 cubic yard
- Personal Protective Equipment Requirements:
- Transporter/Transfer Station:
- Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (If no, skip 9, 10, and 11) ☐ Yes ☒ No
- Reportable Quantity (lbs.; kgs.):
- USDOT Shipping Name:

Check if additional information is attached. Indicate the number of attached pages 16
TCLP & pH (2/97), GPK

- ## C. Generator's Certification (Please check appropriate responses, sign, and date below.)
- Is the waste represented by this waste profile sheet a "Hazardous Waste" as defined by USEPA, Canadian, Mexican and/or state/province regulation? ☐ Yes ☒ No
 - Does the waste represented by this waste profile sheet contain regulated radioactive material or regulated concentrations of Polychlorinated Biphenyls (PCBs)? ☐ Yes ☒ No
 - Does this waste profile sheet and all attachments contain true and accurate descriptions of the waste material? ☒ Yes ☐ No
 - Has all relevant information within the possession of the Generator regarding known or suspected hazards pertaining to the waste been disclosed to the Contractor? ☒ Yes ☐ No
 - Is the analytical data attached hereto derived from testing a representative sample in accordance with 40 CFR 261.20 (c) or equivalent rules? ☐ NA ☒ Yes ☐ No
 - Will all changes that occur in the character of the waste be identified by the Generator and disclosed to the Contractor prior to providing the waste to the Contractor? ☒ Yes ☐ No

Certification Signature: Tuyen Nguyen Title: Environmental Coordinator
Name (Type or Print): Tuyen Nguyen Company Name: Avondale Industries, Inc. Date: 2-27-97

D. WMI Management's Decision

- FOR WMI USE ONLY
- Management Method: ☒ Landfill ☐ Solidify ☐ Bioremediation ☐ Other (Specify) _____
 - Proposed Ultimate Management Facility: Jefferson Parish RDF/Woodside
 - Hours of acceptance: _____
 - Precautions, Special Handling Procedures, or Limitations on Approval: NO free liquids approved for disposal.
- Generic Approval: ☐ Yes ☒ No
Special Waste Decision: ☒ Approved ☐ Disapproved
Salesperson's Signature: [Signature] Date: March 3, 1997
Technical Manager's Signature: [Signature] Date: 03-04-97

C3
MATERIAL SAFETY DATA SHEET

BLASOCUT 2000 UNIVERSAL ART. NO. 870 / BLASOCUT 4000 STRONG ART. NO. 872

PRODUCT IDENTIFICATION

MANUFACTURER: BLASER SWISSLUBE INC

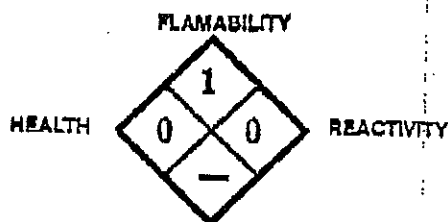
ADDRESS: Westgate Industrial Park
GOSHEN NY 10924

EMERGENCY PHONE NUMBER: (914) 294-3200

PRODUCT NAME: BLASOCUT 2000 UNIVERSAL Art. No. 870

BLASOCUT 4000 STRONG Art. No. 872

PRODUCT TYPE: Water Soluble Metal Working Coolant, Mineral Oil based



H	0
F	1
R	0
C	0

PRODUCT COMPOSITION AND INFORMATION ON INGREDIENTS

Blasocut is a tested, nonhazardous Mixture (As defined by 29 CFR 1910.1200) of:

INGREDIENT:	%	CAS NO:
Severely Hydrotreated Mineral Oil	45-65	64742-52-5
Anionic emulsifiers	25-35	68608-26-4
		81790-44-1
Chlorinated paraffins	5-15	81788-76-9
Polar additives	2-5	8016-28-2
		61788-66-7
Corrosion and Fungi inhibitors	0.5-1	
Odorant and Dye (technical grade of food dye)	<0.1	
Stabilizers	Total 0.1-0.5%:	
Na-benzoate; 2, 4-pentandiol, 2-methyl; Ca-acetate; alpha-Tocopherol; citric acid; tartaric acid; ascorbic acid; ascorbylpalmitate; oleylsarcosine and glycerin .		

Blasocut DOES NOT CONTAIN as an ingredient; phenols, nitrites, formaldehydes, or formaldehyde releasing substances heavy metals (such as Lead, Mercury etc.), active sulfur, silicon, arsenic, PCB, PCT, TCDD or other Dioxin related substances. Benzo(a)pyrene content less than 10 ppm (GC-MS method).

All ingredients of Blasocut are listed on the TSCA Chemical Substances Inventory .

Blasocut does not contain nor is it manufactured with Ozone Depleting Substances as defined in the Federal Clean Air Act Amendments of 1990, sections 602 and 611.

MATERIAL SAFETY DATA SHEET
BLASOCUT 2000 UNIVERSAL ART. NO. 870 / BLASOCUT 4000 STRONG ART. NO. 872

EMERGENCY and FIRST AID PROCEDURES

Skin Contact: Wash with plenty of fresh water (good personal hygiene practices are sufficient). Remove any contaminated clothing and launder before reuse.

Eye contact: Rinse with Plenty of fresh water for 20 Min. Consult Physician if necessary.

Inhalation: Remove to fresh air.

Ingestion: DO NOT INDUCE VOMITING, PULMONARY ASPIRATION HAZARD, Consult a Physician without delay. If involuntary vomiting occurs, ensure that mouth is below hip level

FIRE FIGHTING MEASURES

Flash Point: >334°F (Cleveland open Cup)

Explosion limits: not applicable

Auto Ignition Temperature: >572° F

Hazardous Combustion Products: Oxides of Carbon, Nitrogen and traces of oxides of chlorine and sulfur, HCl.

Products formed under ABNORMAL CONDITIONS: Thermal decomposition of the concentrate above 176°F may produce trace amounts of HCl.

Fire Fighting Media: CO2, dry chemical, foam

Special Fire Fighting Procedures: Wear self contained breathing apparatus when fighting fires in confined spaces. Cool exposed containers with water mist.

Unusual Fire or Explosion Hazards: none

ACCIDENTAL RELEASE AND PRECAUTIONS FOR SAFE HANDLING AND STORAGE

Steps to Be Taken in Case Material is Released or Spilled: Contain spill and absorb with oil-binding agents. Spills or leaks may cause slippery conditions. Clean area with warm soapy water.

Waste Disposal Methods: Split emulsion w/ adsorbing agents, salts or ultra-filtration. Dispose according to all applicable Federal, State and Local Regulations.

Precautions to Be Taken in Handling/Storing: Avoid direct solar irradiation of concentrate drums.

Other Precautions: Do not store with strong oxidizers.

MATERIAL SAFETY DATA SHEET
BLASOCUT 2000 UNIVERSAL ART. NO. 870 / BLASOCUT 4000 STRONG ART. NO. 872

EXPOSURE AND CONTROL MEASURES AND PERSONAL PROTECTION

Respiratory Protection: Not generally required

Ventilation: Normal general ventilation is sufficient

Protective Gloves: Not required

Eye Protection: Industrial Safety Glasses are recommended.

Other Protective Equipment or Clothing: None required.

Work/Hygienic Practices: Thorough personal hygiene and clean working practices are sufficient. Wash hands after handling material.

PHYSICAL AND CHEMICAL PROPERTIES OF THE COMPLETE PRODUCT

Boiling Point: 572°F

Pour Point: -22°F

Specific Gravity: Art. 870: 0.951g/cm³
Art. 872: 0.976g/cm³

Solubility in water: emulsifies

Vapor Pressure: Not volatile

Volatiles, %: nil

pH @ 5% fresh: 9.2 • **pH @ 5% after 24 hrs.:** 8.9

Appearance and odor: Green liquid/ Pleasant odor (almonds)

STABILITY AND REACTIVITY DATA

Stability: Stable.

Conditions to Avoid: Avoid direct solar irradiation of drums. Good and safe housekeeping procedures suggest that ALL combustible materials be stored away from strong oxidizers.

Incompatibility (Materials to Avoid): Concentrate: strong oxidizers (as any other combustible materials).

End use dilutions: Magnesium.

Hazardous Decomposition or Byproducts: Thermal Decomposition (Concentrate) above 176°F: Trace amounts of HCl.

Hazardous Polymerization or Byproducts: Will not Occur.

MATERIAL SAFETY DATA SHEET
BLASOCUT 2000 UNIVERSAL ART. NO. 870 / BLASOCUT 4000 STRONG ART. NO. 872**TOXICOLOGICAL INFORMATION**

Blasocut has been tested as a whole for it's health hazards:

LD50 of concentrate: >15g/kg

Eye Irritation: Negative

Ames Test: Negative

LC50 (Art. 870): >8.1g/m3

Skin Sensitizing: Negative

Copies of the actual tests conducted by independent laboratories are available for inspection on request.

Routes of Entry: Inhalation? Unlikely - Skin? No - Ingestion? Accidentally only

Health Hazards (Acute/Chronic): None

Carcinogenicity: None

OSHA Regulated: No

Signs and Symptoms of Exposure: None

Medical Conditions Generally Aggravated by Exposure: Not established

EXPOSURE LIMITS:

OSHA regulation 29 CFR 1910.1000 and ACGIH have established an exposure limit for Oil Mist in Air. The applicability of this exposure limit to emulsions has not been established.

OSHA 29 CFR 1910.1000: 5mg/m3

ACGIH: TLV: 5mg/m3

TRANSPORTATION AND REGULATORY INFORMATION

NFPA Storage: III B

DOT: Not Regulated

NA/UN Number: Not Applicable

SARA TITLE III HAZARDOUS CLASS INFORMATION:

Immediate Health (Acute): No

Reactive Hazard: No

Delayed Health (Chronic): No

Sudden Pressure Release: No

Fire Hazard: No

Blasocut does not contain any ingredients listed on the SARA Title III, Section 313 List or CERCLA List of chemicals. Blasocut as sold, does not meet the criteria of a hazardous waste as defined under 40CFR 261, in that it does not exhibit the characteristics of a hazardous waste under Subpart C, nor is it listed as a hazardous waste under Subpart D. It is the end user's responsibility to determine the regulatory status of the waste at the time of disposal.

Date of Issue: November 16, 1994

Supersedes: REV. #9, 11/01/93

Prepared by: N. Blaser, VP, GM, Blaser Production Inc.

**SGS****SGS Environmental Laboratories**

P. O. Box 1328
Kenner, LA 70063
Phone: (504) 469-6401
FAX: (504) 463-3300

Analysis Certificate

Lab No: E9601-119
File No: 403907

Sample Submitted By:

AVONDALE INDUSTRIES, INC.
NEW ORLEANS, LA

Date submitted: 01/19/96

February 12, 1996

AVONDALE INDUSTRIES, INC.
P.O. BOX 50280
NEW ORLEANS, LA 70150-0280

Attn: TUYEN NGUYEN

Purchase Order No.: MA00340

SAMPLE IDENTIFICATION:

The following samples were received for analysis:

<u>ORDER#</u>	<u>SQ</u>	<u>MATRIX</u>	<u>SAMPLE DESCRIPTION</u>	<u>DATE RECEIVED</u>
E9601-119-1 6050		LIQUID	USED OIL 01/19/96 @ 10:40	01/19/96



SGS Environmental Laboratories

REFERENCES

- EPA600 Method for Chemical Analysis of Water and Wastes, EPA 600/4-79-020, revised March 1983.
- 40CFR136 Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater, Appendix A of 40 CFR Part 136, as revised by Fed. Reg., 60:53541 (October 16, 1995).
- EPASW846 Test Methods for Evaluating Solid Waste, EPA SW-846, 3rd Edition, November, 1986, and Updates I, II, IIA, and IIB (January 1995).
- SM16 Standard Methods for the Examination of Water and Wastewater, APHA, AWWA, WPCF, 16th edition, 1985.
- SM17 Standard Methods for the Examination of Water and Wastewater, APHA, AWWA, WPCF, 17th edition, 1989.
- SM18 Standard Methods for the Examination of Water and Wastewater, APHA, AWWA, WPCF, 18th edition, 1992.
- ASTM American Society for Testing and Materials (ASTM), latest available editions.
- 3M Determination of Selected Organic Vapors in Air, 3M Company, Organic Vapor Analytical Method No. 2, Revision B, January 1986.

**SGS****SGS Environmental Laboratories**

Lab Sample Number: E9601-119-1

Date Received: 01/19/96

Order No.: 6050

Client Sample ID: USED OIL 01/19/96 @ 10:40

Sample Matrix: LIQUID

<u>Method No</u>	<u>Parameter</u>	<u>Results</u>	<u>Units</u>	<u>Blank</u>	<u>MDL</u>	<u>Date/Time/Analyst</u>
1010	Flashpoint	> 150	Deg F	ND	60	02/01/96 10:00 LG
7.3.3.2	Reactive Cyanide	ND	mg/Kg	ND	1.0	02/02/96 09:45 EE
7.3.4.2	Reactive Sulfide	ND	mg/Kg	ND	1.0	02/02/96 09:45 EE
9045	pH	7.38	S.U.	ND	0.01	01/22/96 09:45 LG
D-808	Total Halogens (as Chloride)	ND	Wt%	ND	0.1	02/07/96 11:00 JB

ND denotes Not Detected at a level above the Method Detection Limit.

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Page: 1
(See next result page)

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Member of the SGS Group (Société Générale de Surveillance)

**SGS****SGS Environmental Laboratories**

Lab Sample Number: E9601-119-1 Date Received: 01/19/96

Order No.: 6050

Client Sample ID: USED OIL 01/19/96 @ 10:40

Sample Matrix: LIQUID

Method No	Parameter	Results	Units	Blank	MDL	Date/Time/Analyst
1311	TCLP BNA Extraction	N/A				01/23/96 16:00 LG
3510	TCLP BNA Organics Extraction	N/A				01/29/96 12:00 DL
TCLP SEMIVOLATILE ORGANICS						
8270	Crésol, Total	ND	mg/L	ND	0.01	01/30/96 19:52 JH
8270	2,4-Dinitrotoluene	ND	mg/L	ND	0.01	01/30/96 19:52 JH
8270	Hexachlorobenzene	ND	mg/L	ND	0.01	01/30/96 19:52 JH
8270	Hexachlorobutadiene	ND	mg/L	ND	0.01	01/30/96 19:52 JH
8270	Hexachloroethane	ND	mg/L	ND	0.01	01/30/96 19:52 JH
8270	Nitrobenzene	ND	mg/L	ND	0.01	01/30/96 19:52 JH
8270	Pentachlorophenol	ND	mg/L	ND	0.05	01/30/96 19:52 JH
8270	Pyridine	ND	mg/L	ND	0.01	01/30/96 19:52 JH
8270	2,4,5-Trichlorophenol	ND	mg/L	ND	0.01	01/30/96 19:52 JH
8270	2,4,6-Trichlorophenol	ND	mg/L	ND	0.01	01/30/96 19:52 JH

Surrogate Standard Percent Recovery:

		<u>Sample</u>		<u>Blank</u>	
8270	2-Fluorophenol	68	%	56	%
8270	Phenol-d5	63	%	53	%
8270	Nitrobenzene-d5	87	%	69	%
8270	2-Fluorobiphenyl	105	%	74	%
8270	2,4,6-Tribromophenol	69	%	78	%
8270	Terphenyl-d14	110	%	82	%

ND denotes Not Detected at a level above the Method Detection Limit.

FR-1 12/13/95

Page: 2
(See next result page)

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Member of the SGS Group (Société Générale de Surveillance)

**SGS****SGS Environmental Laboratories**

Lab Sample Number: E9601-119-1

Date Received: 01/19/96

Order No.: 6050

Client Sample ID: USED OIL 01/19/96 @ 10:40

Sample Matrix: LIQUID

Method No	Parameter	Results	Units	Blank	MDL	Date/Time/Analyst
1311	TCLP ZHE Extraction	N/A				01/24/96 15:30 DL
	TCLP VOLATILE ORGANICS					
8240	Benzene	ND	mg/L	ND	0.1	01/25/96 18:05 JH
8240	Carbon Tetrachloride	ND	mg/L	ND	0.1	01/25/96 18:05 JH
8240	Chlorobezene	ND	mg/L	ND	0.1	01/25/96 18:05 JH
8240	Chloroform	ND	mg/L	ND	0.1	01/25/96 18:05 JH
8240	1,4-Dichlorobenzene	ND	mg/L	ND	0.1	01/25/96 18:05 JH
8240	1,2-Dichloroethane	ND	mg/L	ND	0.1	01/25/96 18:05 JH
8240	1,1-Dichloroethylene	ND	mg/L	ND	0.1	01/25/96 18:05 JH
8240	Methylethylketone	ND	mg/L	ND	1.0	01/25/96 18:05 JH
8240	Tetrachloroethylene	ND	mg/L	ND	0.1	01/25/96 18:05 JH
8240	Trichloroethylene	ND	mg/L	ND	0.1	01/25/96 18:05 JH
8240	Vinyl Chloride	ND	mg/L	ND	0.2	01/25/96 18:05 JH

Surrogate Standard Percent Recovery:

		Sample		Blank	
8240	1,2-Dichloroethane-d4	99	%	86	%
8240	Toluene-d8	91	%	96	%
8240	4-Bromofluorobenzene	97	%	96	%

ND denotes Not Detected at a level above the Method Detection Limit.

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(See next result page)

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SGS Environmental Laboratories

Lab Sample Number: E9601-119-1 Date Received: 01/19/96
Order No.: 6050
Client Sample ID: USED OIL 01/19/96 @ 10:40
Sample Matrix: LIQUID

Method No	Parameter	Results	Units	Blank	MDL	Date/Time/Analyst
1311	TCLP Metals Extraction	N/A				01/23/96 16:00 LG
6010	TCLP Arsenic	ND	mg/L	ND	0.2	01/30/96 11:46 SB
6010	TCLP Barium	0.27	mg/L	ND	0.05	01/30/96 11:46 SB
6010	TCLP Cadmium	ND	mg/L	ND	0.05	01/30/96 11:46 SB
6010	TCLP Chromium	ND	mg/L	ND	0.05	01/30/96 11:46 SB
6010	TCLP Lead	ND	mg/L	ND	0.1	01/30/96 11:46 SB
6010	TCLP Selenium	ND	mg/L	ND	0.2	01/30/96 11:46 SB
6010	TCLP Silver	ND	mg/L	ND	0.05	01/30/96 11:46 SB
7470	TCLP Mercury	ND	mg/L	ND	0.0002	02/09/96 10:00 EE

ND denotes Not Detected at a level above the Method Detection Limit.

SGS CONTROL SERVICES INC.

I.R. DE LEON
LABORATORY MANAGER

IRD/jg

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P. O. Box 50280
New, Orleans, LA 70150-0280
Phone: 504-436-2121
Fax: 504-436-5204

CHAIN OF CUSTODY RECORD

ENVIRONMENTAL QUALITY SECTION

MAIN YARD

31A4406

PROJECT NAME: Mechanic Shop - Used Oil

SAMPLED BY: GAVIN BARTHELOT - MIKE BOWMAN

TESTING
REQUIRED

TESTING
REQUIRED

REMARKS

[illegible]

REVIEWED

DATE: 1/19/94
BY: [Signature]

[Signature]

Leona Hughes

1119	1400
------	------

Dear Mother

Charles E. Estey

7/19/96 1400

0

TIME:

NOTES:

REVIEWED
DATE:
BY:

**SGS****SGS Environmental Laboratories**

P. O. Box 1328
Kenner, LA 70063
Phone: (504) 469-6401
FAX: (504) 463-3300

REC'D MAR 25 1996

Analysis Certificate

Lab No: E9603-024
File No: 403974

Sample Submitted By:

AVONDALE INDUSTRIES, INC.
NEW ORLEANS, LA

Date submitted: 03/05/96

March 18, 1996

AVONDALE INDUSTRIES, INC.
P.O. BOX 50280
NEW ORLEANS, LA 70150-0280

Attn: TUYEN NGUYEN

Purchase Order No.: MA00340

SAMPLE IDENTIFICATION:

The following samples were received for analysis:

<u>ORDER#</u>	<u>SQ</u>	<u>MATRIX</u>	<u>SAMPLE DESCRIPTION</u>	<u>DATE RECEIVED</u>
E9603-024-1 6516		OIL	RECYCLE OIL 03/05/96 @ 09:45	03/05/96



SGS Environmental Laboratories

REC'D MAR 25 1996

REFERENCES

- EPA600 Method for Chemical Analysis of Water and Wastes, EPA 600/4-79-020, revised March 1983.
- 40CFR136 Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater, Appendix A of 40 CFR Part 136, as revised by Fed. Reg., 60:53541 (October 16, 1995).
- EPASW846 Test Methods for Evaluating Solid Waste, EPA SW-846, 3rd Edition, November, 1986, and Updates I, II, IIA, and IIB (January 1995).
- SM16 Standard Methods for the Examination of Water and Wastewater, APHA, AWWA, WPCF, 16th edition, 1985.
- SM17 Standard Methods for the Examination of Water and Wastewater, APHA, AWWA, WPCF, 17th edition, 1989.
- SM18 Standard Methods for the Examination of Water and Wastewater, APHA, AWWA, WPCF, 18th edition, 1992.
- ASTM American Society for Testing and Materials (ASTM), latest available editions.
- 3M Determination of Selected Organic Vapors in Air, 3M Company, Organic Vapor Analytical Method No. 2, Revision B, January 1986.

**SGS****SGS Environmental Laboratories**

Lab Sample Number: E9603-024-1

Date Received: 03/05/96

Order No.: 6516

Client Sample ID: RECYCLE OIL 03/05/96 @ 09:45

Sample Matrix: OIL

REC'D MAR 25 1996

<u>Method No</u>	<u>Parameter</u>	<u>Results</u>	<u>Units</u>	<u>Blank</u>	<u>MDL</u>	<u>Date/Time/Analyst</u>
1010	Flashpoint	90	Deg F	ND	60	03/14/96 13:30 EE
D-808	Total Halogens (as Chloride)	ND	Wt%	ND	0.1	03/11/96 13:00 EE

ND denotes Not Detected at a level above the Method Detection Limit.

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**SGS****SGS Environmental Laboratories**

Lab Sample Number: E9603-024-1

Date Received: 03/05/96

Order No.: 6516

Client Sample ID: RECYCLE OIL 03/05/96 @ 09:45

Sample Matrix: OIL

REC'D MAR 25 1996

Method No	Parameter	Results	Units	Blank	MDL	Date/Time/Analyst
1311	TCLP BNA Extraction	N/A				03/07/96 15:00 DL
3510	TCLP BNA Organics Extraction	N/A				03/08/96 10:00 DL
TCLP SEMIVOLATILE ORGANICS						
8270	Cresol, Total	ND	mg/L	ND	0.1	03/09/96 04:03 JH
8270	2,4-Dinitrotoluene	ND	mg/L	ND	0.1	03/09/96 04:03 JH
8270	Hexachlorobenzene	ND	mg/L	ND	0.1	03/09/96 04:03 JH
8270	Hexachlorobutadiene	ND	mg/L	ND	0.1	03/09/96 04:03 JH
8270	Hexachloroethane	ND	mg/L	ND	0.1	03/09/96 04:03 JH
8270	Nitrobenzene	ND	mg/L	ND	0.1	03/09/96 04:03 JH
8270	Pentachlorophenol	ND	mg/L	ND	0.5	03/09/96 04:03 JH
8270	Pyridine	ND	mg/L	ND	0.1	03/09/96 04:03 JH
8270	2,4,5-Trichlorophenol	ND	mg/L	ND	0.1	03/09/96 04:03 JH
8270	2,4,6-Trichlorophenol	ND	mg/L	ND	0.1	03/09/96 04:03 JH

Surrogate Standard Percent Recovery:

		<u>Sample</u>		<u>Blank</u>	
8270	2-Fluorophenol	53	%	55	%
8270	Phenol-d5	32	%	46	%
8270	Nitrobenzene-d5	41	%	68	%
8270	2-Fluorobiphenyl	63	%	80	%
8270	2,4,6-Tribromophenol	72	%	84	%
8270	Terphenyl-d14	60	%	76	%

ND denotes Not Detected at a level above the Method Detection Limit.

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**SGS****SGS Environmental Laboratories**

Lab Sample Number: E9603-024-1

Date Received: 03/05/96

Order No.: 6516

REC'D MAR 25 1996

Client Sample ID: RECYCLE OIL 03/05/96 @ 09:45

Sample Matrix: OIL

<u>Method No</u>	<u>Parameter</u>	<u>Results</u>	<u>Units</u>	<u>Blank</u>	<u>MDL</u>	<u>Date/Time/Analyst</u>
POLYCHLORINATED BIPHENYLS (PCBs)						
8080	PCB-1016	ND	mg/Kg	ND	4.0	03/12/96 23:11 JH
8080	PCB-1221	ND	mg/Kg	ND	4.0	03/12/96 23:11 JH
8080	PCB-1232	ND	mg/Kg	ND	4.0	03/12/96 23:11 JH
8080	PCB-1242	ND	mg/Kg	ND	4.0	03/12/96 23:11 JH
8080	PCB-1248	ND	mg/Kg	ND	4.0	03/12/96 23:11 JH
8080	PCB-1254	ND	mg/Kg	ND	4.0	03/12/96 23:11 JH
8080	PCB-1260	ND	mg/Kg	ND	4.0	03/12/96 23:11 JH

ND denotes Not Detected at a level above the Method Detection Limit.

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**SGS****SGS Environmental Laboratories**

Lab Sample Number: E9603-024-1

Date Received: 03/05/96

Order No.: 6516

Client Sample ID: RECYCLE OIL 03/05/96 @ 09:45

Sample Matrix: OIL

REC'D MAR 25 1996

Method No	Parameter	Results	Units	Blank	MDL	Date/Time/Analyst
1311	TCLP ZHE Extraction	N/A				03/07/96 15:00 DL
	TCLP VOLATILE ORGANICS					
8240	Benzene	0.300	mg/L	ND	0.05	03/08/96 23:26 JH
8240	Carbon Tetrachloride	ND	mg/L	ND	0.05	03/08/96 23:26 JH
8240	Chlorobenzene	ND	mg/L	ND	0.05	03/08/96 23:26 JH
8240	Chloroform	ND	mg/L	ND	0.05	03/08/96 23:26 JH
8240	1,4-Dichlorobenzene	ND	mg/L	ND	0.05	03/08/96 23:26 JH
8240	1,2-Dichloroethane	ND	mg/L	ND	0.05	03/08/96 23:26 JH
8240	1,1-Dichloroethylene	ND	mg/L	ND	0.05	03/08/96 23:26 JH
8240	Methylethylketone	36.00	mg/L	ND	0.5	03/08/96 23:26 JH
8240	Tetrachloroethylene	ND	mg/L	ND	0.05	03/08/96 23:26 JH
8240	Trichloroethylene	ND	mg/L	ND	0.05	03/08/96 23:26 JH
8240	Vinyl Chloride	ND	mg/L	ND	0.1	03/08/96 23:26 JH

Surrogate Standard Percent Recovery:

		Sample		Blank	
8240	1,2-Dichloroethane-d4	96	%	97	%
8240	Toluene-d8	95	%	95	%
8240	4-Bromofluorobenzene	97	%	96	%

ND denotes Not Detected at a level above the Method Detection Limit.

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SGS Environmental Laboratories

Lab Sample Number: E9603-024-1 Date Received: 03/05/96
Order No.: 6516
Client Sample ID: RECYCLE OIL 03/05/96 @ 09:45
Sample Matrix: OIL

REC'D MAR 25 1996

Method No	Parameter	Results	Units	Blank	MDL	Date/Time/Analyst
1311	TCLP Metals Extraction	N/A				03/07/96 15:00 DL
6010	TCLP Arsenic	ND	mg/L	ND	0.2	03/11/96 10:15 JH
6010	TCLP Barium	0.11	mg/L	ND	0.05	03/11/96 10:15 JH
6010	TCLP Cadmium	ND	mg/L	ND	0.05	03/11/96 10:15 JH
6010	TCLP Chromium	ND	mg/L	ND	0.05	03/11/96 10:15 JH
6010	TCLP Lead	ND	mg/L	ND	0.1	03/11/96 10:15 JH
6010	TCLP Selenium	ND	mg/L	ND	0.2	03/11/96 10:15 JH
6010	TCLP Silver	0.18	mg/L	ND	0.05	03/11/96 10:15 JH
7470	TCLP Mercury	ND	mg/L	ND	0.0002	03/12/96 15:00 EE

ND denotes Not Detected at a level above the Method Detection Limit.

SGS CONTROL SERVICES INC.

LARRY MC CARTHY
LABORATORY MANAGER

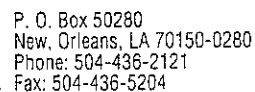
LM/jg

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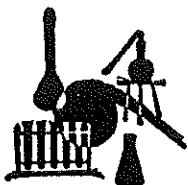
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CHAIN OF CUSTODY RECORD

ENVIRONMENTAL QUALITY SECTION

1058-ASI 2/94



ANALYSIS LABORATORIES, INC.

2932 LIME STREET • P. O. BOX 8666 • METAIRIE, LOUISIANA 70011
TELEPHONE (504) 889-0710 • FAX (504) 889-2613

PACE

98A-1260

Subcontract

Analytical

Results

Analyte Parameter/Protocol: Bottom Sediment / ASTM D4007
Measurement Units: % Volume

Sample I. D.:	<u>PIX-001</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Analytical Result:	<u>8.33</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Detection Limit:	<u>0.11</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Dilution Factor:	<u>----</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Date Analyzed:	<u>12-11-98,</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
	<u>1430, RA</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

Quality Control

Lab Blank Result:

Duplicate Control

Duplicate Result:	<u>8.33</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Original Result:	<u>8.33</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Rel. % Difference:	<u>0</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

Matrix Spike Analysis

Spiking Concen.:	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Background Result:	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Matrix Spk. Result:	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Ms. Recov., Percent:	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Mat. Spk. Dup. Result:	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
MSD Recov., Percent:	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
MS/MSD Rel. % Diff.	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

QC Check

"True Value":	<u> </u>	<u> </u>
Measured Value:	<u> </u>	<u> </u>
Recovery, %:	<u> </u>	<u> </u>

Pace Analytical

Pace Analytical Services, Inc.
1000 Riverbend Blvd, Suite F
St. Rose, LA 70087

Tel: 504-469-0333
Fax: 504-469-0555

Stephanie Tillman
Avondale Industries, Inc.
P.O. Box 50280/MS-42
New Orleans, LA 70150-0280

Project: OIL FROM 6FP
Site:
Episode: PIX

To: Stephanie Tillman

Enclosed please find the analytical results for sample(s) received by
Pace Analytical Services, Inc. - New Orleans.

This report contains a summary of the quality control data associated
with the analyses as well as copies of the chain-of-custody documents.

You may direct any inquires concerning this report to your Project
Manager, or any one of the Project Managers listed below:

Ms. Karen H. Brown, Manager, Ext. 325
Mr. William R. Shackelford, Ext. 326
Ms. Cindy Olavesen, Ext. 327

Sincerely,


Project Manager

12-22-98
Date

Enclosures

Pace Analytical Services, Inc. - New Orleans
Sample Cross Reference Summary

Episode: PIX Client: Avondale Industries, Inc.

Project: OIL FROM 6FP

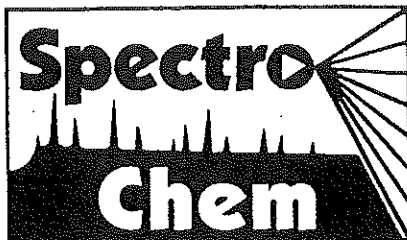
Site: _____

<u>Lab ID</u>	<u>Client ID</u>	<u>Description</u>	<u>Matrix</u>	<u>Collected</u>	<u>Received</u>
PIX-001	GAS FREE PLANT	OIL	Other	12/03/98	12/04/98

Narrative for Episode PIX

Organic Preparations

The laboratory was unable to perform TCLP on sample PIX-001 using the method specified weights due to the limited sample volume available; the extractions were performed using reduced sample weights and reduced leaching fluid volumes, in the ratios as specified by the method.



REPORT OF ANALYSIS

TO: Ms. Karen Brown
Pace/New Orleans
1000 Riverbend Blvd
St. Rose, LA 70087

PROJECT NUMBER: 4896
PURCHASE ORDER: Verbal
DATE RECEIVED: 12/09/98

SAMPLE DESCRIPTION:

One (1) Liquid sample labeled as "PIX-001."


ANALYSIS PERFORMED:

Ion Chromatography(IC)
API Gravity ASTM D-287
Kinematic Viscosity ASTM D-445

RESULTS:

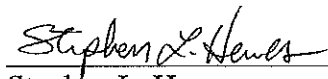
API Gravity	11.5 API
Viscosity @ 40°C	124. cSt
Sulfur	1.91 %
Chloride	603. ppm

REPORTED BY:


Kenneth J. Darce
Chemist

12/09/98
Date

REVIEWED BY:


Stephen L. Hewes
Chemistry Lab Manager

12/09/98
Date

The sample material involved in this project will be retained for 30 days from the date of the report. Unless we are advised otherwise, the material will be disposed of in an acceptable manner. Hazardous material will be returned to the client.